# **EXHIBIT 4**

May 9, 2026 Meet and Confer Transcript

# Shawn Padilla

V.

MGM Grand Hotel, LLC, et al.

Transcript of

**Meet and Confer** 

Volume I

May 9, 2025



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1	Page 1 UNITED STATES DISTRICT COURT
2	DISTRICT OF NEVADA
3	* * * * *
4	SHAWN PADILLA, an individual,
5	Plaintiff,
6	Case No.
7	2:22-CV-02109-RFB-BNW vs.
8	
9	MGM GRAND HOTEL, LLC, a Nevada entity; ANDREW
10	STEVENSON, an individual (Doe 1); KEVIN ADAMS, an
11	individual (Doe 2); JERIMIAH TIPTON (Doe 3), DOES IV
12	through X, and ROES I through X,
13	
14	Defendants.
15	
16	
17	REMOTE VIDEOCONFERENCE MEET AND CONFER OF COUNSEL
18	Held on May 9, 2025
19	At 10:31 a.m.
20	
21	
22	
23	Reported by: Kimberly A. Farkas, RPR, CCR #741
24	
25	Job No. 60811 Firm #116F

## Shawn Padilla v. MGM Grand Hotel, LLC, et al.

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2
               Remote Videoconference Meet and Confer of
                                                                1
                                                                          Steve and Raffi, I don't know if you have
     Counsel, held on Friday, May 9, 2025, at 10:31 a.m.,
                                                                  anything different that you want to touch on today. If
                                                                2
3
     before Kimberly A. Farkas, Certified Court Reporter in
4
     and for the State of Nevada.
                                                                3
                                                                   not, then we can kind of jump in.
 5
                                                                         MR. NAHABEDIAN: For clarification, the
                                                                4
 6
     APPEARANCES
                                                                5
                                                                   issues with respect to Gaming Control Board, if I'm not
 8
     For the Plaintiff:
                                                                6
                                                                   mistaken, it's in relation to the subpoena for
9
           RAFFI A. NAHABEDIAN, ESQ.
           Law Office of Raffi A. Nahabedian
                                                                7
                                                                   employment files and the Nevada Gaming Control Board
10
           7408 Doe Avenue
                                                                8
                                                                   report, to narrow that down. I don't think there's
           Las Vegas, Nevada 89117
11
                                                                9
                                                                   anything else that's an issue with the Nevada Gaming
           STEPHEN G. CLOUGH, ESQ.
                                                               10
                                                                    Control Board that's before us here today. Steve, if
12
           Maier Gutierrez & Associates
           8816 Spanish Ridge Avenue
                                                               11
                                                                    I'm incorrect -- I believe that's all. So that's one.
13
           Las Vegas, Nevada 89148
                                                               12
                                                                          And then, two, as it relates to depositions
     For the Defendants:
15
           LAWRENCE J. SEMENZA, III, ESQ.
                                                               13
                                                                   from the perspective of the 30(b)(6) and the roster of
           KATIE CANNATA, ESQ.
                                                               14
                                                                    depositions that we've submitted, as I understood from
16
           Semenza Rickard Law
           10161 Park Run Drive
                                                               15
                                                                    Steve, there is some -- or maybe from your office,
17
           Suite 150
                                                                   there's some overlap, potentially, with Nevada Gaming
           Las Vegas, Nevada 89145
                                                               16
18
                                                               17
                                                                    Control Board depositions, 30(b)(6) depositions, and
           NONA M.L. LAWRENCE, ESQ.
19
                                                               18
                                                                    our depositions, which I thought that would be part of
           Deputy Attorney General/Gaming Division
20
           State of Nevada
                                                               19
                                                                    this conversation as well, as well as, you know, trying
           Office of the Attorney General
                                                               20
                                                                   to get all this stuff coordinated with all the counsel
           1 State of Nevada Way, Suite 100
21
           Las Vegas, Nevada 89119
                                                               21
                                                                   involved.
2.2
                                                               22
                                                                          So one is the 30(b)(6) overlap between our
           MICHAEL P. SOMPS, ESO.
23
           State of Nevada
                                                               23
                                                                   categories and the Nevada Gaming Control Board. But I
           Office of the Attorney General
                                                               24
           5420 Kietzke Lane
                                                                    don't even know if I've ever seen a 30(b)(6) depo from
24
           Suite 202
                                                               25
                                                                    Nevada Gaming Control Board yet to ascertain what that
25
           Reno, Nevada 89511
                                                            3
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#### PROCEEDINGS

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3 MR. SEMENZA: All right. So my name is L.J. Semenza representing MGM in the lawsuit brought by Mr. Shawn Padilla. The purpose of today's get together 6 is to conduct a meet and confer conference relating to a whole host of issues. I thought it would be prudent 7 to have a court reporter transcribe the meeting so that it is clear what was discussed to the extent that, 10 obviously, we'll need a record relating to the meet and 11 confer for any motion practice that ultimately results if we aren't able to reach agreements on a whole host 12 13 of issues, I think, today. So that's the reason why I

thought it appropriate to have it transcribed. As I understand it, the meet and confer conference, we're going to talk about a few issues. One is a subpoena issued to the Gaming Control Board relating to report records and employment files. Two, a subpoena that was issued to Bill Hornbuckle. I think we're going to touch on some scheduling issues and the

21 deposition issues, and in the context of those 22 deposition issues, the 30(b)(6) depositions that

23 plaintiff wants to undertake and how that relates to

24 the fact witness depositions. So that's kind of the

25 big picture from my perspective. 1 overlap is. I just heard that there was an overlap

between the requests that maybe were orally expressed

by Nevada Gaming Control Board to you guys, meaning to

And then -- so that's the depositions. Then

MGM's counsel. So that's that.

6 there's some scheduling of the other depositions that 7 we've noticed via identity of persons in a roster based 8 upon disclosures from MGM. So I would assume that 9 Nevada Gaming Control Board would be involved in that potentially. I don't know. But maybe they are because 10

11 maybe they want to depose those people as well. And

those are listed out on the emails. And I don't know 12

13 if Nevada Gaming Control Board is aware of the identity

of those individuals, but we should probably clarify 14

15 that. So as it relates to that part, the Nevada Gaming

16 Control Board and us and you, obviously, need to

17 discuss and coordinate those depositions and we need to

18 have those depositions scheduled in the near future.

And then the third category, if I'm

19 20 understanding correctly, would be our recent subpoena

21 and notice of deposition that was issued to

22 Bill Hornbuckle. And that category I don't know why or

23 if there's a reason that the Nevada Gaming Control

24 Board would be involved since it's not them who's

25 issued the subpoena, it was us, and that subpoena has



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# Shawn Padilla v. MGM Grand Hotel, LLC, et al.

1 nothing to do with Nevada Gaming Control Board. So 2 that I throw out there, and we can brush that topic 3 when we get to the third category of discussion.

MR. SEMENZA: I appreciate your input on 4 those issues, Raffi. So I think, obviously, our 5 position with regard to the Gaming Control Board 6 subpoena for records is that the information sought is absolutely protected and that there is no basis for which to seek any of the protected information either that is contained in the employment files, potentially, 11 of the various agents, but also the report itself. And so, to that extent, we would join in the Gaming Control 13 Board's objection to any such subpoena.

So I don't know that we're going to make any 15 headway on that specific issue other than I think it is -- it would be appropriate that you withdraw any sort of subpoena or request for that information. I think based upon generally the case law and the statute that that information is absolutely protected.

20 My concern and part of my desire to have this 21 meet and confer was to flesh out certain issues 22 relating to the plaintiff's failure to provide us notice of the subpoena, which, in all candor and with all due respect, I think is a clear violation of the 25 Federal Rules of Civil Procedure, and, in addition to

1 undertook it deliberately. Actually, the first 2 paragraph in the letter, which will become part of --

we'll mark it as an exhibit to this exercise, it

4 actually says it was completely inadvertent, not

5 deliberate. It says it was inadvertent and it was innocent. And that information came from my

7 discussions with Mr. Clough. And it doesn't say

8 deliberate whatsoever. It actually says "inadvertent

9 error," an innocent mistake. So go on and finish. MR. SEMENZA: Okay. Well, I appreciate it. 10

11 So you can clarify and explain as you see fit, and I'm not going to cut you off on that nor am I going to 12

13 interrupt you on that either. 14 So the subpoena was sent via email. There 15 have been representations made in recent emails that

the communication with the AG's Office would be 16 17 provided to my office. While I have received the

18 objection letters and a response and those sorts of

19 things, to date, I have received no emails that contain 20 email strings between the AG's Office and Maier

21 Gutierrez or you, Raffi, relating to the communications

22 that took place. Again, I need that information to 23 further evaluate what happened.

24 My concern is, as I've expressed, is that 25 thereafter, and it is referenced in Mr. Clough's

1 that, is a clear violation of the Rules of Professional 2 Conduct.

3 And to give some context to this discussion, 4 we have a rather heated deposition of Mr. Tipton on March, I believe it was 13th, of 2025, where the privilege issue arose. I had grave concerns about. Raffi, some of your questions relating to exploring --7 I'll put it that way -- how reports are created, what's in those reports, et cetera, et cetera. And during that deposition, I expressly related that that type of 11 information in the report was privileged, and that we 12 as a gaming licensee enjoyed that privilege.

Thereafter, on March 17th, a subpoena was, I believe, emailed to the AG's Office, which we were not copied on. We were not provided notice of it. And, Raffi, in your email that is dated May 5th -- I'm sorry -- May 6th of 2025, at 5:11 p.m., it appears in that first paragraph that the failure to provide us with the notice of that subpoena or that email was done deliberately. And that gives me grave concerns about the conduct that has been undertaken in this case.

22 MR. NAHABEDIAN: Okay. 23 MR. SEMENZA: No, no, no.

24 MR. NAHABEDIAN: No, please, let me 25 interject. You said a word that -- you said we

1 letter, which I believe was dated -- give me one

moment -- March 31st. So the subpoena was dated

March 17th. I believe time for compliance was

March 28th. There was an objection letter sent in

5 between that time. And then Mr. Clough sent a letter

on March 31st, 2025. The third paragraph on the first

7 page of that letter seems to reference that there was a

meet and confer conference that was undertaken before

9 the issuance of this March 31st, 2025, letter. Again,

10 we didn't get any notice of that nor were we

11 participants in that meet and confer conference.

12 There were, as I understand it, some 13 additional back and forth with different counsel other than Mr. Somps and Ms. Lawrence, whereby there was a 14 15 follow-up meet and confer conference that took place in 16 May. We were, similarly, not included in that meet and 17 confer conference.

18 You've known from well before the subpoena 19 was drafted and issued that we asserted -- and I don't 20 think there's any room for debate, maybe I'm wrong --21 that we are parties to that privilege. And, yet, we 22 were excluded from any discussions associated with 23 that. And that gives me, again, some grave concerns.

24 And this is not something that is just sort of in a vacuum and something that is just, you know, a



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## Meet and Confer

# Shawn Padilla v. MGM Grand Hotel, LLC, et al.

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1 one-off, as I would put it. Because we were never

2 provided with any notice that plaintiff's counsel had

received a redacted copy of the report from Gaming

Control Board. That was first discovered by me, I

believe, during a deposition of one of the Gaming

6 Control Board agents. That was never disclosed as part

of the initial disclosures. And had I known about that

early on, I would have objected to production of even

9 the redacted report in this particular matter. And

that information, in my viewpoint, was not provided to

11 me appropriately. 12

The other thing I want to raise relating to 13 this issue is that, Raffi, you have sent repeated

emails and, in fact, you've referenced it here during

15 our meet and confer conference, that you don't believe

16 that depending on what the issue is that either I

17 should be involved in certain discussions or the

18 AG's Office should be involved in certain discussions.

19 I have emails from you talking about, I don't know why

you're including the AG's Office in certain stuff.

And, again, I think that gives context to what took

22 place relating to not being provided with a copy of the 23

subpoena when it was issued on March 17th.

24 What I suspect, and I don't know whether I 25 will get a definitive answer to this, is that, in fact,

1 perspective. Raffi, I want to give you sort of that

2 opportunity to say what you want to say relating to

3 that or anything else you want to, and then we can move

on to the other topics.

5 MR. CLOUGH: This is Steve Clough first.

6 Just to clarify a couple things you said, L.J.,

appreciate it, you seem to be a little prejudice

against Raffi, but that's fine; we'll deal with that as

9 we go through here. But almost all of the

10 communications with, I believe the first name is

Darlene Caruso, those were done through me. We 11

12 originally sent the subpoena for the Nevada Gaming

13 Control Board to Michael Somps and Nona because they

14 said, hey, let's see if we can accept service.

Then the email -- we got the letter back 16 saying, yeah, acceptance of service. Email exchanges

went back and forth. And I just happened to see the

18 name Lawrence, which obviously was Nona Lawrence's name

19 in the email stream, and that's when I told Raffi about

20 the email, hey, I thought they were on it. I'm sorry.

21 I misspoke. And that's what the email exchange was

22 regarding that.

But all of the communications with Ms. Caruso

24 were through me to try to set up a meet and confer

25 about the subpoena. And I inadvertently did not serve

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1 the failure to provide us with notice, the failure to

allow us to participate in a meet and confer conference

was done deliberately so that the plaintiff could

4 obtain records, whether it be portions of the

employment files or the Gaming Control Board report,

without us knowing about it, which is what happened

originally in this case. Although, the report that was 7

originally produced was in redacted form.

So I don't believe, contrary to, Raffi, your emails, that this issue is dead and buried. I think

that this issue is very much alive. And to the extent

that we need to tee this issue up either by virtue of a 12

13 motion to compel on your behalf or a motion for protective order on our behalf -- I'm assuming the

15 AG's Office, given their objection, would participate

in a motion for protective order -- but these issues 17 are still relevant and important in determining whether

18 and to what extent this was done intentionally.

19 So absent a withdrawal of your request to

20 subpoena these records, we, obviously, don't see any 21 other recourse than to seek relief from the court and

22 bring these issues to the court's attention and see how

the court will ultimately want to deal with those 24 issues.

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So that's issue number one from my

1 it upon you. So when the meet and confer did happen

2 and we realized you weren't on it, we immediately

stopped the meet and confer, and then we served the

subpoena upon you so that we could, so to speak,

5 restart the meet and confer process about the subpoena.

With that being said, I'm going to leave the

rest of the statements for Raffi.

8 MR. NAHABEDIAN: Now, as to the report that

9 was provided by the AG's Office that you belatedly 10

became aware of, I will let you know that it was not my intention to keep anything from you whatsoever. The

AG's Office sent me that. Now, if you take issue with 12 what the AG's Office sent, perhaps you should direct 13

14 that issue to the AG's Office. But it's becoming

15 abundantly clear that the purpose of this communication

16 here that's being recorded by a court reporter pursuant

to your request, is really to come after me for some 17

18 reason.

19

You mention the depo that took place with

20 Mr. Tipton. Well, just for your edification, as you

21 were there, or I should say a reminder, Ms. Lawrence, a

22 fully competent and trained attorney that works for the

23 AG's Office, was sitting next to Mr. Tipton during that 24 deposition. You kept interjecting objections where she

25 had made no objection. You kept imposing your position



## Meet and Confer

to be on the record.

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# Shawn Padilla v. MGM Grand Hotel, LLC, et al.

and your ideas as to the scope of the deposition in
areas that she never expressed an opposition or
instructed her client not to answer, so on and so
forth. You engaged in that conduct, not Ms. Lawrence.
Ms. Lawrence and I had a very wonderful
deposition, as did Mr. Tipton, as he expressed to me
after the deposition. So that is something that needs

9 So I would like to know that the expressions that you rendered here on this transcript directed at 11 me with respect to a disclosure of a document from the 12 AG's Office, I would like to know how much interaction you've had with the AG's Office about your objection to them disclosing to me, them, AG's Office, disclosing to 15 me a document. Did you inform them that you thought it 16 was some deliberate tactic, some surreptitious misdeed? 17 I have to wonder. Because it's certainly expressed on this transcript here taken by this court reporter that you're trying to garner some sort of a prejudice against me, which my colleague himself has even 21 articulated because it became overly abundantly clear.

Now, I would like to know, did you contact

the AG's Office? Did you express any disdain to them,

any opposition to them, about that disclosure that they

provided me with? Because it wasn't me that disclosed

not Mr. Nahabedian and Ms. Caruso. So we'll get that
 to you as well.

But as it relates to Steve's office's
realization that they inadvertently, innocently made a
mistake of not getting you that subpoena in March, as
soon as we learned or as soon as he learned from
Ms. Caruso, he said, oh, my gosh, you're right. The
meet and confer ended, and it was sent out to your
office the next day.

Now, as Mr. Clough said, it's all been reset.

Now, there's a subpoena. The AG's Office has a
subpoena, albeit that they got it earlier, but it
doesn't matter because now you have it. They have it.
It's all before the parties right now. And that now is
before us right now. Meaning, we're having this to
discuss the subpoena.

17 Now, you have an issue with the subpoena, all 18 this other stuff about it being surreptitiously sent 19 and all this stuff, notwithstanding the fact that it 20 was mistakenly sent by Mr. Clough's office. Here's the 21 thing. We're here. We're now. You object to it. You 22 object to it based upon the Dorney [sic] case, if I'm 23 not mistaken. And you also object to it based upon --24 sorry -- the Donrey case. And you also object to it 25 based upon 463.120.

them

15

something to them and kept it from you. It was them that disclosed it to me and kept it from you.

So let's make it abundantly clear, as the
deposition transcript reads, and if we need to attach
that as an exhibit to this what I consider to be a
hearing on your part, if we need to attach the
deposition transcript of Tipton, we can also include
that.

9 But, nonetheless, as Mr. Clough expressed,
10 once Mr. Clough's office, not Raffi's office, not
11 Raffi's interactions with Ms. Caruso, but Mr. Clough's
12 interactions with Ms. Caruso and Mr. Clough's office's
13 notice of the subpoena to the AG's Office, not
14 something that was sent from my email address but
15 Mr. Clough, notwithstanding the fact that you left his
16 name out repeatedly in your diatribe, Mr. Clough's
17 office realized the mistake. It was rectified.

Now, I did a favor for Mr. Clough the other
day because he was in the throes of a matter. I sent
out an email. I understood he was going to send
everything to you. If he hasn't, my apologies. I will
make certain that it gets done before this conference
call is over so we can verify that you received the
emails that Steve was supposed to send, not me, Steve,
because they were emails between Steve and Ms. Caruso,

17
Now, you guys can move to quash and make your

Now, you guys can move to quash and make your arguments. And we can oppose and we can move to compel

3 and make our arguments. We, obviously, are at impasse4 as to the manner in which you interpret the law, the

5 case law. We interpret it significantly different than

6 you interpret it. We interpret it significantly

you interpret it. We interpret it significantly

7 different than, as you like to say, absolutely

8 privileged. The case law doesn't use that language.

9 So since we're at an impasse, category number 10 one, employee files and the NGCB report is going to be

1 a matter of a motion, you a motion to quash or

12 protective order, us opposition and a motion to compel.

Now, next topic, depositions --

14 MR. SEMENZA: Well, I want to address the15 depositions last.

MR. NAHABEDIAN: I disagree because there's no reason why -- and, again, thank you for doing that. now, when there are emails that go out that pertain to

the Nevada Gaming Control Board, even though you're a

20 party -- we all have cases with multiple parties. Just

21 because we talk to one lawyer that's one party doesn't

22 mean we have to have all the lawyers on the same call.

23 I've never read anywhere or seen any statute,

24 regulation, et cetera that mandates conversation with

25 one, conversation with all, as you're so expressing on

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## Meet and Confer

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# Shawn Padilla v. MGM Grand Hotel, LLC, et al.

1 the record here today.

2 Now, if there's issues between my discovery 3 with the AG's Office and the AG's Office issue with my discovery to them, there's no reason for everybody to be on that call. That can be dealt with one on one, my office and the AG's Office, and the AG's Office with us. End of story. Same thing with discovery to you or discovery to us from your office. Nobody says that everybody has got to be on the call. I've never heard of that. If you can provide me with a statute and case 11 law in support of your position, please do so. Until then, nobody is engaged in malfeasance or wrongdoing 13 intentionally, innocently, et cetera.

The only mistake was that Steve's office inadvertently didn't serve that March 17th subpoena to your office. It's been rectified. We're here today.

17 Now, as it relates to you wanting to talk 18 about the depositions last, 30(b)(6) and the named deponents. You want to talk about it last because you want to include the AG's Office on a subpoena and notice of deposition that this office served upon Bill Hornbuckle. Can you articulate to me why the

AG's Office needs to be involved on a telephone conversation or meet and confer involving

Mr. Hornbuckle who's on the board of directors of MGM,

1 30(b)(6) person at MGM.

Now, unless the Nevada Gaming Control Board wants to also depose Mr. Hornbuckle and they say, yep, we want to depose him, and if they do, then, fine, let them be on this call and let them send out their own notice of deposition and their own subpoena.

7 MR. SEMENZA: I think you're sort of proving 8 my point with all of this, Raffi. At the end of the 9 day, I think the reason I'd like to talk about Mr. Hornbuckle first is because that is an insular 10 11 issue. There's a lot of complexity and a lot of issues associated with the other depositions, both the fact 12 witness depositions and the 30(b)(6) depositions, that 14 are going to be undertaken. So I don't know whether we're going to have -- whether we're going to have 15 agreements or issues or those sorts of things relating 17 to that particular topic. And so I think this is an 18 easy topic, the Hornbuckle deposition, to address and get out of the way before there's sort of a roundtable discussion about discovery generally in this case and 21 the fact witness discovery and the 30(b)(6) discovery, 22 those sorts of things.

So with regard to the Hornbuckle deposition, I mean, unless you're just telling them that they need 25 to get off the meet and confer, which they have no

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1 and how that board of directors member is a board of directors or part of the AG's Office that they need to be involved in that conversation? Can you please 4 articulate that for me.

MR. SEMENZA: Well, one, Raffi, I don't need 6 to. But we're here on a meet and confer conference that relates to issues involving the AG's Office. So are you requesting them to get off the phone at this point in time? 9

MR. NAHABEDIAN: As it pertains -- as it pertains to the deposition notice and subpoena of Mr. Hornbuckle, that pertains to us and you as counsel for MGM. Mr. Hornbuckle's deposition does not pertain 14 to the AG's Office. It does not pertain to the Nevada Gaming Control Board. It pertains to a subpoena to a member of the board of directors of MGM. That's why there is no basis for them to be on this call.

17 18 Now, because of that, we can go to category 19 two, which is the 30(b)(6) depositions, as well as the 20 other identified named persons that we've discussed 21 with your office. So category two can very easily be 22 done with the AG's Office because it actually does 23 pertain to them because they, themselves, have expressed an interest in deposing people and they, 25 themselves, have expressed an interest in deposing a 1 obligation to do so, I just want to get that issue out

of the way. I don't think it's going to take very 3 long, to be perfectly honest, because I anticipate the

4 parties are not going to be able to agree and that

there's going to be motion practice that will

6 ultimately result. So that's why I want to talk about

7 the Hornbuckle one and get it out of the way.

8 I think that, obviously, we don't see any 9 relevance in attempting to depose Bill Hornbuckle. It's my understanding that he would have no personal 10 knowledge relating to this matter. It's my -- I mean, he's an Apex witness. You're not seeking to depose 13 him, or the company rather, as a 30(b)(6) witness. So

the way that we interpret all of this is that this an 14 15 attempt to harass an Apex witness, and this is done 16 intentionally. There is no justifiable basis for

seeking to depose him. 17

18 What I can tell you is that given your intent 19 to depose him and the issuance of a subpoena, if it is 20 still your intent to do so after this meet and confer, 21 that I can accept service of that subpoena, both the 22 deposition subpoena and the document production 23 subpoena. We will be filing a motion for protective order relating to that, and we will be seeking our attorneys' fees and costs and any other sanctions that

## Meet and Confer

# Shawn Padilla v. MGM Grand Hotel, LLC, et al.

1 we deem appropriate by your attempts to depose 2 Mr. Hornbuckle, which are so overtly improper. I don't 3 know where that came from, that idea came from, but it's out of left field and I don't understand it. I 5 really, really don't. So I think that's our position with regard to 6

7 Mr. Hornbuckle. If you want to or can articulate a basis, a relevant, appropriate basis, for deposing him and what personal information he would specifically have relating to this issue, then please do so for my 11 consideration. But I don't see it and I don't think I 12 will see it. But I'm open minded in that regard. So 13 that's why I wanted to talk about the Hornbuckle 14 deposition second.

15 MR. NAHABEDIAN: "MGM00041 Surveillance 16 Responsibilities. The surveillance department has been 17 created by the board of directors."

18 Mr. Hornbuckle, along with a host of other 19 people, are the board of directors of MGM. And since the surveillance department was created by the board of directors and the surveillance responsibility is 22 overseen by, and given the fact that they created the 23 surveillance department, that is the basis for which 24 the deposition of Mr. Hornbuckle will go forward. 25 We are at an impasse at this juncture. You

1 MGM. Therefore, Mr. Hornbuckle was the most perfect 2 category or person to depose as it relates to the board 3 of directors of MGM, which was the creator of the 4 surveillance department.

5 Now, you and I don't agree. So it's already 6 out. He's been served. You can bring your motion. 7 We'll bring our opposition or we'll bring our motion to 8 compel.

9 So now let's go to category three.

10 MR. SEMENZA: No, no, no. I have questions 11 for you. Raffi.

12 MR. NAHABEDIAN: I've made -- my record's 13 clear. Your record's clear. I didn't ask you questions because there's no need. I'm not here to sit 15 here -- I'm not here to argue this point with you. You've made it clear you think it's completely 16

17 irrelevant. You want to seek sanctions against me. 18

It's been served. Let's just go through the motions. Our meet and confer on this subject is over. We're not going to withdraw it. I gave you the basis for the subpoena. I gave you the basis for the

22 deposition notice. I am not going to change my 23 position.

24 You've made your position clear. You think 25 it's irrelevant. You think it's pointless. You think

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1 it's harassing. So we don't agree. 2

So at the end of a meet and confer when people don't agree, they just say, let's go forward

with motion practice. Just like you threatened to seek

sanctions against me, we'll do the same against you

because we believe, as I articulated, that there's a 7 justified, reasonable, and rational basis to take his

8 deposition.

9 Now, that's it. Category three, 30(b)(6) 10 depos, let's go.

11 MR. SEMENZA: Hold on, Raffi. I need to know 12 -- I'm sorry to interrupt and that's not my intention. I need to know when he was served and how he was

14 served. That was my question.

You said he was served. You said it was delivered to his office. That is not personal service. 16 I represented that I would accept service of the

subpoena and documents. I need to understand if the 19 service was effectuated and when and where and how.

That's all.

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20 21 MR. NAHABEDIAN: We sent out the subpoena and 22 the deposition notice yesterday. And so it is our 23 belief and understanding, since it was sent out 24 yesterday, that it was done and effectuated. So that's 25 it.

have made your position clear. We have made our position clear. We have set out and provided you with

a notice of deposition and subpoena. And the notice of deposition and subpoena, if I'm not mistaken, has

already been delivered to Mr. Hornbuckle's office.

6 So you guys can bring your motion. We 7 disagree with you. Your own document refers to the board of directors as it relates to surveillance.

9 This case is a matter of the surveillance 10 department, the surveillance department who misidentified the plaintiff, the surveillance

department who misinformed and provided wrong 12

information to a host of individuals that led to all 13

the damages sustained by Mr. Padilla in this case. 14 15 Therefore, our position is clear. Your position is

clear. We believe, based upon the information that we

17 have, his deposition as a member of the board of directors, and mind you, he is the only board of

19 directors member that has an association and

20 affiliation with MGM because he also serves as the CEO.

21 while all the other board of directors members are not 22 affiliated with MGM, meaning they are not co-CEOs or

other types of officers or directors or members within

24 MGM. They are within their own companies, their own companies' perspectives that are independent of the

## Meet and Confer

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# Shawn Padilla v. MGM Grand Hotel, LLC, et al.

1 And we have all the right in the world to do 2 that. You never said before we sent it out that you'll accept it. All you said is that you oppose any service, and for us without any law, without any rules, said, we direct you not to indirectly or directly provide it. 6

I asked you to provide me with case law or some sort of statute, something, and you didn't. And so, therefore, we did what the rules allow. We lawfully, pursuant to the rules, had a subpoena provided to a process server and the process server went out to serve the subpoena. That's it.

Now, next category.

MR. SEMENZA: Okay. Please provide me with an affidavit of service so that I know that it was effectuated. Please.

MR. NAHABEDIAN: I do. As soon as I receive that, I will send out the notice of service to everybody. We can file it with the court, actually.

20 MR. SEMENZA: Okay. I mean, do what you got 21 to do on that front. I'm just asking for a copy of the 22 affidavit of the service and affirmation relating to 23 when he was served.

24 MR. NAHABEDIAN: Thank you. I will do so. 25 MR. SEMENZA: Great. All right. So, I mean,

1 this is more in your boat, Raffi. I mean, we have --

1 I'm working on in that regard. So I can't tell you 2 that, you know, witness A is going to be the 30(b)(6) for topic B or whatever the case or topic 2, whatever it is. So that's where we stand as far as those 5 depositions are concerned.

It's my understanding, and Nona and Mike can 6 jump in, that they have expressed an interest in 7 8 deposing some of our witnesses or providing a 30(b)(6) 9 deposition notice. I don't recall, as I sit here right now, given all the things that we've gone through and 10 11 talked about, whether they've sent something over with 12 the topics. They may have. I just don't know offhand. 13 And that's something that we will work with them and you to determine what that overlap ultimately will be. I mean, if they're the same topics, then they'll be a 16 consolidation of the depo. We're not going to do 17 separate depos for similar items or similar topics in that regard. 18 19

So that's what's going on from my perspective relating to the depositions. Dovetailing that issue with the Hornbuckle and the motion practice that is going to result from the subpoena that you issued to the Gaming Control Board, I don't know where we go as far as discovery is concerned. Because those motions, 25 whether it is motion to compel or motion for protective

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1 order, one, they're going to have to be drafted and

and correct me if I'm wrong. We have provided you with fully briefed and through no fault of the federal

court, they're going to sit for a little while before

someone gets to them. 4 5 So I don't know what to do in that regard 6 given the discovery that needs to be completed, the

7 motion practice that we ultimately have to undertake in 8 this case. So I leave that issue open for discussion

9 one way or the other. But that, I guess, is what I can

MR. CLOUGH: This is Steve Clough, by the

10 offer up as far as where we're at with those 11

depositions.

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13 way. I can kind of give -- we had communications a little more than, obviously, you and Raffi have about 14 15 these depositions. The emails have been going back and 16 forth between my office and you. Appreciate it. I know we did get all those dates for some of those fact 17 witnesses. You had expressed some questions about 19 where we were on the 30(b)(6) topics. Obviously, you 20 already kind of told me what you're trying to do as far

21 as the fact witnesses potentially being those 30(b)(6). 22 But, yes, we have all of those dates, but we 23 did not finalize the topics for 30(b)(6). We had an 24 original, kind of like, meet and confer about them and 25 chatted about them. And before we finalized it -- it

potential dates for the fact witness depositions. I'm going to be candid with you and let you know that we have not spoken substantively with the fact witnesses as of yet to prepare them for their depositions. So that is something that we will need to accomplish. In 7 the context of doing that, we will have a better sense as to whether any of those individuals will be appropriate 30(b)(6) deponents. But in sum and substance, I would anticipate that they will not be the

Now, I don't know, in all candor, where we 15 left off, whether we had an agreement relating to those topics, whether that was still in flux, whether there was going to be motion practice. There's been a lot happening, obviously, in this case and the others that I've been dealing with. So I just, frankly, don't recall. But that's where we stand as far as the fact witnesses depositions are.

30(b)(6) deponents based upon the topics that we've

already gone over and talked about.

22 And then the way that I look at this is I need to get a better handle on fact witnesses to be 24 able to provide you with guidance on whether there will 25 be or won't be formal overlap with the 30(b)(6), which

## Meet and Confer

Shawn Padilla v. MGM Grand Hotel, LLC, et al.

1 could have been from you, Mr. Semenza, it could have 2 been from Ms. Cannata, I don't remember. But an email 3 came saying, hey, we need to coordinate with the Nevada Gaming Control Board, the AG's Office -- sorry, not the Nevada Gaming Control Board, but the AG's Office about

getting which topics they might want to add because

they may want to join in our deposition of the

30(b)(6). Then it just kind of went to a stalemate about those topics themselves.

10 I haven't seen any topics from the

11 AG's Office. I don't know if they've been going back 12 and forth with you or not on that. I don't know.

13 But that's where we are with those. Without 14 knowing if the fact witnesses are, in fact, going to be

30(b)(6) witnesses, it's kind of difficult for, you

16 know -- I mean, unless somewhere along the line in the

17 deposition we're doing of one of these fact witnesses and we start asking questions that might be potentially

30(b)(6) questions, and you say, yeah, they're going to 19

be able to bind the corporation as far as that

particular topic, that would be something that might

22 come up during the depositions themselves rather than

23 through what you seem to be saying chatting with the

24 witnesses. I don't know a better way to put that than

25 that, which is what you just kind of eluded to.

1 meeting with them, the better, but I understand we are

2 short on time to get all of these conducted and

3 concluded. So that's my recommendation, I guess, as to

4 how we move forward on this issue.

5 MR. SOMPS: This is Mike Somps with the

6 AG's Office. I'll just speak briefly. And, Nona,

7 correct me if I'm wrong. But the witnesses from MGM

8 that I think that we are looking for would be, first,

9 someone who can speak to the player tracking system and

explain how that works. And then, secondly, I think 10

11 that we're looking for someone who can authenticate the

12 video surveillance recordings because that's,

13 obviously, an important piece of evidence in this case

14 and we want to make sure that that's something that can

15 be admitted as evidence.

Is that right, Nona?

17 MS. LAWRENCE: Yeah, that's right. Can you

18 hear me?

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MR. SOMPS: Not very well.

20 MS. LAWRENCE: Sorry. I just moved my

21 computer and I guess it's not working well.

22 For the second category, we also want someone

who can identify how they retain the surveillance, what 23

24 they show to agents when they get to the property, if

25 they show them all the views, that sort of thing,

But that's my understanding of where we are with the depositions and the 30(b)(6) deposition as 3 well as the topics.

4 MR. SEMENZA: Okay. So, Steve, what I would 5 recommend we do then -- and this is for Mike and Nona's benefit as well -- why don't we work on scheduling a

somewhere in that range. I will endeavor with Katie to go through, look at the topics that you all have put

conference call for late next week or midweek,

10 forward, Stephen. And then Mike and Nona may have

11 provided topics. I don't remember as I'm sitting here

right now. They may have provided topics. If they 12 have, we can get those over to you. If they haven't, 13

then I would ask that they provide some topics to us 15 and share, obviously, with all parties.

16 And then we can, one, talk about the overlap 17 between the topics for the AG's Office and the plaintiff. We can talk about a schedule for, generally

19 schedule, for any 30(b)(6)s, and the time frame by 20 which those would ultimately be completed. And then we

can work on scheduling the fact witnesses for our prep to discuss with them what they know and how they know

and all of those sorts of things to determine whether 24 they will be a 30(b)(6) witness or not.

So the more time you give me in regard to

someone who can testify to that.

2 MR. CLOUGH: Again, Stephen Clough. I

believe that's already in our topics for a 30(b)(6),

but have you sent these out --

5 MS. LAWRENCE: Did you send us the topics? 6 MR. CLOUGH: I was about to ask you, did you

7 send topics to Katie or to Lawrence?

8 MS. LAWRENCE: I have requested those two 9 topics a while back, and I didn't know that you were 10 requesting the same. So I think this is a good example 11 of why we should all share everything and not exclude 12 one party.

13 So our two topics are probably meshed in with 14 your list. It's just a matter of finding out who those 15 people are.

16 MR. NAHABEDIAN: Nona, just with respect to 17 what you just said, neither one of us should feel bad about, you know, not having global interactions and 19 discussions. I mean, we've all been practicing lawyers 20 for far too long. And if you had interactions with the 21 MGM about topics and we had interactions with the MGM

22 about topics independent of you guys, neither one of us

23 should feel that we did anything wrong, notwithstanding 24

the record that was expressed today. So I just want to 25 let you know. When I heard you say, oh, well, gosh, we



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## Meet and Confer

# Shawn Padilla v. MGM Grand Hotel, LLC, et al.

didn't interact with you guys and you guys didn't interact with us, it's not an uncommon occurrence in 3 litigation with multi parties.

So I just want to say I have no issues with your independent interaction, just like I have no, with Steve's independent interaction that you weren't included in. But that's the whole purpose of this telephone call. If I understood the reason for this 9 telephone call was actually to address these things,

not next week, but actually address them today. 10 11 I thought that we were coming forward -- I 12 mean, Steve and I are prepared, and I'm certain you 13 guys are, equally as prepared, to have this discussion

about the 30(b)(6) and the other witnesses. It was 15 included in the email exchanges about today's purpose.

16 So I'm really confused about why we're not going to 17 hash this out today when that was an express purpose of

today's conversation. However, it seems that much was

done about the expression of Raffi Nahabedian's name on the record, which so thankfully, my cocounsel

21 Mr. Clough rectified because it was so misplaced.

22 But, nonetheless, I thought that this

23 telephone conference was to discuss the 30(b)(6) and deposition schedule. It was made very well clear in

the email exchanges. So can someone express to me why

1 reconciled those issues, then I would anticipate there 2 will be more motion practice relating to the 30(b)(6) 3 topics.

4 MS. LAWRENCE: Along the lines of the dates, 5 can I just jump in and live in reality? I mean, the list is -- there's seven, looks like, fact witnesses or 7 30(b)(6). I don't know who they're going to be. If 8 our two are not those two, that's nine. And then 9 you're still wanting, I believe, Katie, to depose our 10 30(b)(6) for the GCB; correct? So that's 10 11 depositions and today is the 9th. I believe discovery closes on June 5th. I mean, that's, like, a depo a 12 13 day; right, if we're being realistic.

MR. NAHABEDIAN: Were you asking Katie? MS. LAWRENCE: No. I'm just saying it's looking like there's still 10 left and we've got three weeks.

18 MR. NAHABEDIAN: I concur with you 19 100 percent. I just want to go back to the emails with 20 respect to this meet and confer that we're having. In 21 that meet and confer, I actually expressed on two 22 separate occasions were any of the fact witnesses --23 because this was a topic of discussion in the past --24 any of the fact witnesses that we've identified, and 25 there's a roster of them that we've identified and

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1 we should continue this discussion for another week when that was the whole purpose for having a court 3 reporter on this call?

4 MR. SEMENZA: Well, I can respond to that, Raffi. I mean, at the end of the day, we sent you 5 6 dates and I've gotten no response relating to the fact witnesses. So the ball is in your court as far as 7 8 dates. That's the first thing.

The second thing is I've made representations 10 to you that I did not think off the cuff that the 30(b)(6) witnesses would be the same as the fact witnesses. So that's the information I have, which 12 13 I've provided to you.

So are you going to provide us with a schedule for the fact witnesses that we provided that information to you? So, again, you know, if you want to characterize things one way -- and I'm happy to have

17 the discussion and now we've been having this 19 discussion for 45 minutes. If you don't want to have a 20 conference call next week, just say so. That's fine.

21 Send me the dates for the depositions and the 22 fact witnesses. And then I will coordinate whether they're going to be any overlap. And you can send me dates for the 30(b)(6), and we will continue to have 25 discussions about those objections. If we have not

1 discussed with your office, because there was a topic 2 of, well, are these also people that can serve as 3 30(b)(6)s.

Now, in my email I actually gave two

5 examples. One is the person who is, I forget her name, 6 but the director of surveillance who issued the

7 reprimand to the surveillance operator. And so we want

8 to depose her. But then is that person also capable of being the 30(b)(6) of surveillance? So we asked that.

And then we also asked a question about the manager, 10

the security manager, because there's an identity of a

12 security manager that was involved in the incident.

Now, is that person also can serve as the 30(b)(6)? And so since I addressed that twice in the emails that

15 I sent related to this meet and confer, did anybody

16 make an assessment prior to today given the advanced 17 notice of those questions in my emails if those two

people actually can serve as a 30(b)(6) given that that 19 was the purpose of this meet and confer today?

MR. SEMENZA: Well, that wasn't the purpose

21 of the meet and confer today. 22 MR. NAHABEDIAN: What was the purpose? MR. SEMENZA: That was part of the purpose 23

was to discuss all of the depositions, in addition to 25 Bill Hornbuckle's deposition, and in addition to the



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## Meet and Confer

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# Shawn Padilla v. MGM Grand Hotel, LLC, et al.

issue relating to the subpoena that you issued. 2 So was that email sent on May 6th, Raffi? 3 MR. NAHABEDIAN: I don't have my computer up. 4 I just saw I sent two emails. And in two emails I actually articulated that question about can this person who is the surveillance manager be the same as the 30(b)(6) in re: surveillance. Or can the casino or the security department manager also serve as a

10 Now, if you want the dates of those emails, 11 I'm sure my colleague who has his computer open can 12 check on those, but I don't want to waste any more 13 time. But they were sent and they were sent to you, Katie, Mr. Somps, and Ms. Lawrence. And so they are 15 definitely documented.

16 Now, again, whether you want to say that this 17 conversation or this meet and confer that you scheduled 18 with a court reporter wasn't about this topic, I beg to 19 differ because it was specifically about addressing this topic of depositions, 30(b)(6) as well as fact witnesses. And I completely agree with Ms. Lawrence as 22 to the time frame. So, obviously, we're under, like, a 23 pretty strict time frame given the dates that

24 Ms. Lawrence just articulated, which I thought was one 25 of the bases for having this meet and confer was for

1 30(b)(6) issues, and I don't want to mischaracterize if

2 that's not what you said so let me know. If we haven't

3 then that's going to be subject probably to motion

practice. So those depositions won't go forward

anyway. So if you want to send over the deposition 5

dates, then we can go from there and get those tied up 6

7 and scheduled and get those folks prepped and go from

8 there. So, yeah, I guess from Raffi's perspective,

9 we're done.

10 MR. CLOUGH: One quick thing, Mr. Semenza, 11 L.J. I didn't say that we hadn't come to some

resolution on the 30(b)(6) topics. We got through 12

quite a few. There was, I want to say -- I'd have to

14 go back through my notes -- like, two or three that I

think we were trying to figure out how to limit and

15 16 change the verbiage in order to both accommodate what

17 we're looking for and what you wanted and what you were

18 objecting to. It's just not finalized. I don't think

19 it's something that really needs to be motion practice 20

21 MR. SEMENZA: Okay. Well, I mean, I 22 appreciate that, Stephen. And I would like to say

there wouldn't be motion practice, but given the things 23

24 that have gone on in this case, nothing surprises me

25 anymore.

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and then go from there.

1 all of us to get on the phone to coordinate these things. And it was pretty clear in the exchanges that that was the purpose.

4 So for us to then say, hey, listen, I got out of my system talking about this inadvertent error that 5 6 is all Raffi's fault, which turned out to be no fault 7 of mine whatsoever; it came from Mr. Clough's office and it was inadvertent, as he repeatedly expressed. And then, two, Mr. Hornbuckle's deposition. And then, 10 all of a sudden, it's like, oh, no, we'll just meet and convene next week on the third topic, which really, given Ms. Lawrence's own expressions, close of 12 13 discovery is coming up in less than 30 days, that really is the reason we're having this conversation is 15 for us to coordinate with Ms. Lawrence and Mr. Somps

17 MR. CLOUGH: This is Steve. All of a sudden, 18 it got real quiet. Can you guys hear me?

the depositions of people at MGM.

19 MR. SEMENZA: Yeah, we can hear you. There 20 was nothing I was responding to. So I guess at the end of the day, we won't conduct the meet and confer 22 conference or a continued conference call next week 23 from Raffi's perspective. And you guys will go ahead

and issue the fact witness deposition dates. Given, Stephen, your comment that we had not resolved the

is there some sort of document, email, letter, anything between us that distills down and says, here's what we talked about and here's what we think we agreed to or here's what we don't think we agreed to? If there's something like that that I could take a look at, that 7 would be helpful. If there's not, then let Katie and I 8 talk about that and see where we left off ultimately

Do we have -- from your perspective, Steve,

10 Otherwise, if there's not going to be motion 11 practice or there's only going to be partial motion practice relating to some of these topics, then I think 12 what we need to do is go ahead and schedule at least a 13 window by which the 30(b)(6) witnesses will be deposed. 14 15 You will be provided with notice as to whether those 16 same individuals that are going to be testifying as 17 fact witnesses would, in fact, be 30(b)(6) witnesses for certain topics. Obviously, we're not going to 18 19 duplicate depositions, those kinds of things. 20

So from my perspective, I think that kind of solves the issue going forward.

22 MR. NAHABEDIAN: Okay. I just sent an email 23 out to everybody that was part of this email 24 communication about this meet and confer right now.

25 I'm very troubled at you saying that, according to

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## Meet and Confer

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# Shawn Padilla v. MGM Grand Hotel, LLC, et al.

1 Raffi, we're not going to have a meet and confer next 2 week on the subject so we'll just go ahead and do everything and then figure out while in motion practice. 4 5

Again, casting negative dispersions upon me

is going to get you nowhere in this case because the 6 record is pretty clear. This meet and confer right now was to discuss topics. Now, if you want to discuss topics, let's do it because that was part of the bases 9 for this meet and confer. My emails made it clear. 10 11 The emails that you guys sent out to hold this meet and

confer made it very clear.

13 I'm surprised that we're not discussing the 14 topics that Mr. Somps -- although, Ms. Lawrence did actually articulate them right now, so we just 15 expressed back to you, yeah, Ms. Lawrence's topics of 16 17 conversation are consistent with ours.

18 Now, if you guys had read my emails to you 19 back in relation to this meet and confer that you scheduled with a court reporter, and it's critical that perhaps you attach my email communications about this 22 subject of the 30(b)(6)s to the transcript so it can be 23 part of the record because it's in your inbox, it's 24 very clear, hey, will you please let us know about 25 these two fact witnesses also being 30(b)(6)s?

1 30(b)(6) categories as well? That's a question. 2 MR. SEMENZA: I told you the answer. I said 3 I don't think so, but I will confirm.

4 MR. NAHABEDIAN: Okay. So we sent out --5 strike that.

6 We had a conversation over a month ago on 7 this very topic. I then sent two emails, including 8 that request following up on a discussion that's over a 9 month old for a meet and confer that you called to discuss this very topic, and you don't have an answer. 10 11 And, yet, you want to continuously during this call 12 cast negative dispersions upon me and say, it's Raffi, 13 Raffi, Raffi, which, thank God to my colleague, who 14 said it wasn't him at all, it was me.

15 So I have a feeling that the basis of this 16 meet and confer -- it's not a meet and confer 17 whatsoever. It was an attempt to you to discredit me 18 or to cast a negative light upon me. And I take it as 19 a tremendous insult. After somebody practicing law for 20 over 30 years in two different jurisdictions, I find it 21 insulting, I really do.

22 We may not like each other, but it doesn't 23 matter. We're supposed to be professionals. We're 24 supposed to be professionals. Okay. And we should act 25 like that.

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1 Now, prior to this meeting we never got a response to that email, never got a response. And now, as we're in this meeting, which is about the 30(b)(6) and fact witnesses, you're still not providing a 5 response. Unless, of course, you can't provide an educated response based on the knowledge of the 7 question prior to today's meet and confer on the very subject of 30(b)(6) and fact witnesses.

So in my email, which is in your inbox right 10 now, can somebody representing MGM do the dutiful deed and say, yes, when we got this originally, we 12 investigated this because we remember previously during a meet and confer that was held a couple weeks back, if 13 14 not four weeks ago, if not over four weeks ago, 15 actually, it was over four weeks, this very topic was 16 discussed: Are the fact witnesses also part of the

17 30(b)(6) categories that we provided you with. 18 Now, all my email did was remind you of a 19 conversation that we had. And all my emails to you did 20 was to say, since we're on this topic that was part of 21 the request for this 30(b)(6) -- excuse me -- of this 22 meet and confer 30(b)(6) depos and fact witnesses now, since it was talked about over a month ago and it was

also included in my emails, do you guys have a response

to those questions? Do those people serve as our

And I feel that you called this meet and 1 confer and you're skating right now on a topic that the 3 very meet and confer was predicated on, depositions, 4 fact and 30(b)(6), and you're punting. You're punting.

5 And what's really comical about that is you 6 sit here and say, oh, Raffi, you interacted with the 7 AG's Office independent of us. Oh, Raffi, you did this negative stuff. No, no, no, no. The AG's Office's 9 sent me that document, not me. They did.

And I would like to know if you have letters to them chastising them or if you have communications with them chastising them, as you attempted to do here 12 13 as if I did something surreptitious, which I did not. I merely received a letter from the AG's Office, 14 15 nothing more. They sent it. Go after the AG's Office,

16 Nevada Gaming Control Board, not me. 17 Now, again, then you want to say that, oh, well, you're interacting with parties. Look, this is 18

20 them. Well, it sounds like the AG's Office has been

21 including you in communications about their 30(b)(6) 22 witnesses and about the witnesses they want to depose,

23 24 conversations about our witnesses that we want to

25 depose and 30(b)(6)s. Wait, two parties are

and it sounds like we've been including you in

## Meet and Confer

# Shawn Padilla v. MGM Grand Hotel, LLC, et al.

interacting with you. Did you inform the other parties 2 that they were doing that? Did you call me and say, 3 hey, AG's Office wants to do this? Did you call the AG 4 and say, hey, Raffi and Steve want to do that? No, you didn't. But you want to make it seem as if I've been underhandedly dealing with the AG's Office and hiding things from you. I'm sorry that the AG's Office that you align yourself with consistently throughout this 9 proceeding did not notify you that they presented me 10 with a document. Not me present them. They presented 11 me. 12 Now, are we going to go through and finalize

13 this meet and confer about the 30(b)(6) witnesses and fact witnesses or not? Do you have information, as you 15 should have had because it was discussed over a month 16 ago and included in two of my emails, about those two 17 people that are fact witnesses being 30(b)(6) 18 witnesses?

19 I have no problem with having another meet and confer on this subject, another meet and confer on this next week. No problem whatsoever. Actually, let's do it. Because I don't want you to say, oh, 23 Raffi prevented it from happening. Oh, my gosh, he prevented it from happening. That guy is such a 24 25 meanie.

1 MR. NAHABEDIAN: I'm not. I'm not. Please. I'm enjoying this. 2 3 MR. SEMENZA: You certainly sound frustrated. Okay. Well, I mean, I think the next logical step is, 4 5 and my offer to have a subsequent conversation about it, obviously, I think that's a good idea, to talk as 7 opposed to not talk. But, I mean, the ball is sort of in your court. You guys need to reschedule the 9 30(b)(6) deposition notice. So select some dates to do 10 that. 11 You guys were given dates relating to the

12 fact witnesses. You haven't sent out deposition notices relating to that. My suggestion would be that 14 we do the 30(b)(6) deposition notice after the fact 15 witnesses are concluded. That makes the most sense. 16

And I've represented that we'll get you the 17 information you need to determine whether any of the 18 fact witnesses will be 30(b)(6) witnesses. But that's, 19 obviously, up to the client in that regard.

20 So, yeah, we'll send out a notice. We'll 21 reconvene. We'll work on getting some additional 22 information, and we'll go from there.

23 MR. CLOUGH: This is Steve again. Thank you. 24 Just kind of one interjection here. Everything was 25 kind of put on hold when we did that settlement

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1 conference with Wechsler. So, but we'll move 2 everything forward. Please get that continued meet and

confer done early next week. Earlier the better,

4 obviously, because we're all on a time crunch. I 5 appreciate it. Thank you. 6

MR. SEMENZA: Sure. Thanks, Steve. Appreciate it, everyone. If anyone else has any input 7 8 they'd like to add --

9 MR. CLOUGH: Nothing on our end. 10 MR. SOMPS: Already addressed. 11 MR. SEMENZA: All right. Thank you, madam

12 court reporter. We'll need a copy on an expedite, please. Thank you. 13

14 MR. NAHABEDIAN: Thank you.

THE COURT REPORTER: Mr. Clough, are you 15 16 still there?

17 MR. CLOUGH: Madam court reporter, could you 18 send one to me as well?

19 THE COURT REPORTER: Sure. Do you want me to send it to both of you? I'll send it to both of you. 20

21 MR. CLOUGH: No. You can just send it to me 22 and I'll get it over to Raffi. I don't need it 23 expedited. Whenever you get it to me. 24 THE COURT REPORTER: Okay. Sounds good.

(Proceeding concluded at 11:39 a.m.)

1 Let's do it. Next week we'll do it. But here's the deal. Are you going to pay my fee for doing it today, trying to do it today, after you called this

meet and confer? Are you going to pay my fee? We'll 5 do it next week. Okay.

6 Thank you guys so much. Nona, Mr. Somps, 7 thank you guys. I really appreciate this exchange because it's been very revealing for all of us. It's been a great exercise for all of us. And I can't wait to read this transcript. So what day next week do you 11 want to have this meet and confer, Mr. Semenza? 12

MR. SEMENZA: Whenever you'd like, Raffi. MR. NAHABEDIAN: Good. We'll send out an 13 14 email to everybody. Well, actually, it's a follow-up 15 on your meet and confer that you called for this purpose. Why don't you guys send us an email,

17 everybody, when you guys select a date. Tell us the dates and times that you guys are available next week,

19 since you want to do it next week. Send us all an 20 email, Mr. Semenza, and we'll reschedule the 30(b)(6)

21 and fact witness discussion meet and confer that was supposed to go forward today on a date you select. So 22

23 send that out to everybody. Okay?

24 MR. SEMENZA: You're obviously frustrated, 25 Raffi ---

**EXITAS** 

25

	50	
1	CERTIFICATE OF REPORTER	
2	STATE OF NEVADA )	
-	) ss:	
3	COUNTY OF CLARK )	
4	I, Kimberly A. Farkas, a Certified Court Reporter	
5	licensed by the State of Nevada, do hereby certify:	
6	That I reported the Remote Videoconference Meet and	
7	Confer of Counsel held on May 9, 2025, at 10:31 a.m.	
8	That I thereafter transcribed my said stenographic	
9	notes into written form, and that the typewritten	
10	transcript is a complete, true, and accurate	
11	transcription of my said stenographic notes.	
12	I further certify that I am not a relative,	
13	employee or independent contractor of counsel or of any	
14	of the parties involved in the proceeding; nor a person	
15	financially interested in the proceeding.	
16	Inancially interested in the proceeding.  IN WITNESS WHEREOF, I have set my hand in my	
17	office in the County of Clark, State of Nevada, this	
18	10th day of May, 2025.	
19	10011 day 01 may, 2023.	
1 2	Kim berly D Jarkan	
20	Kimberly A. Farkas, CCR NO. 741	
21	Rimberry A. Parkas, CCR NO. 741	
22		
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	15,19	7:17 38:2	48:5	addition	AG's
1	31:2,24		absent	6:25	7:14
	33:3	9	11:19	37:24,25	8:16,20
.0	34:14,23			additiona	10:18,20
36:10,16	35:11,24		absolutel	1	11:15
	36:2,7,10	9th	У	_	13:9,12,
.00	37:9,13,	36:11	6:8,19	9:13	13,14,23
36:19	18 38:7,		17:7	48:21	14:12,13
1:39	9,20	A	abundantl	address	14,23
49:25	40:1,12	l ———		15:14	15:13
2+4	41:14,17	a.m.	У 12 15	17:14	16:11
3th	43:3,8,	49:25	13:15	20:18	18:3,6,
7:5	17,21,22		14:21	34:9,10	20,23
.7th	44:1	able	15:3	addressed	19:2,7,
7:13 9:3	45:4,21	3:12 21:4	accept	37:14	14,22
10:23	46:13,17	27:24	12:14	49:10	30:4,5,1
18:15	47:20	30:20	21:21		31:17
	48:9,14,	about	25:17	addressin	32:6
2	18	3:16 7:6,	26:3	g	45:7,8,
	30(b)(6)s	20 10:7,	acceptanc	38:19	14,15,20
	31:19	19 11:6	_	admitted	46:3,6,7
	37:3	12:19,25	e	32:15	again
28:3	42:22,25	13:5	12:16		8:22 9:9
025	45:25	14:13,24	accommoda	advanced	23 10:21
7:5,17	21	16:18	te	37:16	17:17
9:6,9	31st	18:18,19	40:16	affidavit	33:2
	9:2,6,9	20:9,20		26:15,22	35:16
88th		21:6	accomplis		38:16
9:4	4	22:13	h	affiliate	42:5
		27:13	27:7	d	45:17
3	45	28:11	according	23:22	48:23
	35:19	29:14,18,	41:25	affiliati	
0		24,25			against
0	463.120	30:5,9	act	on	12:8
39:13	16:25	31:16,18	44:24	23:20	14:20
44:20		33:6,18,	actually	affirmati	24:17
0(b)(6)	5	21,22	8:1,4,8	on	25:5
3:22	l ———	34:14,15,	19:22	26:22	agents
4:13,17,		16,19	26:19		6:11 10:
22,24	5:11	35:25	34:9,10	after	32:24
18:18	7:17	37:10	36:21	13:17	ago
19:19	5th	38:5,18,	37:4,18	14:7	43:14,23
20:1,13,	7:16	19 39:5	38:5	21:20	44:6
21 21:13	36:12	41:4,8,24	42:15	44:19	46:16
25:9		42:21,24	43:15	45:15	
27:10,12,		43:3,23	46:21	47:3	agree
25 28:2,8	6	45:5,21,	47:14	48:14	21:4 24:
29:19,21,		22,24	add	AG	25:1,3
	6th	i '	ıadd	46:3	38:21



agreed	12:9	26:3,4	appropria	29:10,20,	assuming
41:4,5	along	27:9	tely	21 30:20	11:14
	along	30:10	10:11	31:2,3,6,	_+
greement	22:18	31:19		11 32:3,	at
27:15	30:16	35:23	areas	15 34:13	7:17
greement	36:4	36:22,24	14:2	35:7,11	14:10
!	already	38:12	argue	37:2,13,	17:3,9
3:12	23:5 24:5	48:17	24:15	18 38:6,	19:8
20:16	27:13	49:7		8,20,21	20:1,8
	29:20		arguments	39:8	22:25
head	33:3	anybody	17:2,3	41:15,16	25:2
39:23	49:10	37:15	arose	43:3,25	27:22
41:13		anymore	7:6	44:1,18	29:10
42:2	also	40:25	/:6	45:12,13	31:9 35:
lhair	6:11 15:7	10.25	articulat		39:16,20
lbeit	16:23,24	anyone	e	46:5,14	40:20
16:12	20:3	49:7	18:22	48:6	41:6,13,
lign	23:20	anything	19:4 22:7	49:18	25 44:14
46:8	32:22		42:15	ascertain	49:25
	37:2,8,	4:2,9		4:25	
live	10,13	12:3	articulat		attach
11:11	38:8	13:11	ed	ask	15:4,6
11	42:25	33:23	14:21	24:13	42:21
3:3 4:11,	43:16,24	41:2	25:6	31:14	attempt
20 6:23,		anyway	38:5,24	33:6	21:15
24 12:9,	although	40:5		asked	44:17
	11:7		as	26:7	
23 16:10,	42:14	anywhere	3:15	37:9,10	attempte
14,17,19	another	17:23	4:12,14,	37:9,10	45:12
17:20,22,	35:1	Apex	19 5:11,	asking	attempti
25 20:8	46:19,20	21:12,15	15 7:12	26:21	_
23:13,21	46:19,20	21:12,15	8:3,11,24	30:18	g
25:20	answer	apologies	9:12	36:14	21:9
26:1,3,25	10:25	15:21	10:1,6		attempts
27:14	14:3		12:8	asserted	22:1
28:10	44:2,10	appears	13:8,20	9:19	
29:22		7:17	14:1,6	assessmen	attentio:
31:9,15,	anticipat	appreciat	15:3,5,9	t	11:22
23 32:25	е	e	16:2,3,5,	37:16	attorney
33:11,19	21:3	6:4 8:10	6,10		13:22
37:24	27:11	12:7	17:4,7,25	associate	13.22
39:1,6,	36:1	29:16	18:17	d	attorney
10,17	2777	l	19:10,12,	9:22	1
43:18,19	any	40:22	19:10,12,	20:12	21:25
44:14	3:11 6:9,	47:7	23:8,17,		
47:8,9,19	13,14,16	49:5,7	23:8,17,	associati	authenti
49:4,11	9:10,20,	appropria		on	ate
	22 10:2	te	25:6	23:19	32:11
llow	11:20	3:14 6:16	26:17		availabl
11:2 26:9	14:23,24	22:1,8	27:6,9,20	assume	
lmost	17:23	l	28:4,9,	5:8	47:18
-IIIO D C	21:8,25	27:10	23,24		



aware	18:19	benefit	boat	by	case
5:13	19:18,22,	31:6	27:1	3:4 5:3	6:18 7:21
13:10	23 20:10	better	hath	10:4	11:7
	21:3		both	11:12	16:22,24
	23:20	27:8,23	20:12	13:9,16	17:5,8
В	24:14	30:24	21:21	14:18	18:10
	25:6	32:1 49:3	40:16	16:20	20:20
oack	28:24	between	49:20	22:1,17,	23:9,14
9:13	30:6	4:22 5:2	briefed	20,22	26:7
12:15,17	32:12	8:20 9:5	29:2	23:14	27:18
29:15	34:21	15:25	briefly	29:12	28:3 29:
30:11	36:23	18:2	32:6	31:19	32:13
33:9	37:1,11	29:16		41:14	40:24
36:19	38:19	31:17	bring		42:6
40:14	42:6,9,23	41:3	11:22	С	cases
42:16,19	43:12	big	23:6		17:20
43:13	46:15,22	3:25	24:6,7		
oad	47:8 49:4		brought	call	casino
33:17	become	Bill	3:4	15:23	38:7
	8:2	3:19 5:22		17:22	cast
oall		18:22	brush	18:5,9	44:12,18
35:7 48:7	becoming	21:9	6:2	19:17	
ased	13:14	37:25	buried	20:5 31:7	casting
5:7 6:18	before	bind	11:10	34:8,9	42:5
16:22,23,	4:10 9:8,	30:20		35:3,20	categori
25 23:16	18 15:22		but	39:22	s
27:12	16:14,15	board	4:23	44:11	4:23
43:6	20:19	3:17 4:5,	5:10,14	46:2,3	43:17
	26:2	7,10,17,	6:11	called	44:1
oases	29:3,25	23,25	11:16	44:9 45:1	
38:25		5:3,9,13,	12:8,9,23	47:3,15	category
42:9	beg	16,24	13:14		5:19,22
oasis	38:18	6:1,6	15:9,11,	came	6:3 17:9
6:8 19:17	behalf	10:4,6	14 16:3,	8:6 22:3	19:18,21
21:16	11:13,14	11:5	12 19:6	30:3 39:7	24:2,9
22:8,23		12:13	22:3,11,	candid	25:9
24:20,21	belatedly	17:19	12 27:10,	27:4	26:13
25:7	13:9	18:25	20 29:9,	candor	32:22
44:15	belief	19:1,15,	22 30:2,	6:23	CEO
ecame	25:23	16 20:2	5,13 31:1	27:14	23:20
13:10	believe	22:17,19,	32:1,7 33:4		
14:21	4:11 7:5,	20 23:8,		Cannata	certain
	4:11 /:5, 14 9:1,3	17,18,21	34:7,10, 22 37:6,8	30:2	6:21
ecause	1	24:2		capable	10:17,18
5:10 10:1	10:5,15 11:9	28:23	38:12,13 40:23	37:8	20 15:22
12:13	12:10	30:4,5	40:23		34:12
14:17,21,		45:16	44:3,22	Caruso	41:18
25 15:19,	23:16	Board's		12:11,23	certainly
25 16:13	25:6 33:3	6:13	48:7,18	15:11,12,	14:17
17:16,21	36:9,11	I	49:1	25 16:1,7	1



48:3	close	8:16	concerned	conferenc	continued
cetera	39:12	13:15	28:5,24	e	39:22
7:9 17:24	closes	41:24	concerns	3:6,16	49:2
18:13	36:12	communica	7:6,20	9:8,11,	   continuou
		tions	9:23	15,17	sly
change	Clough	8:21		10:15	44:11
24:22	8:7 9:5	12:10,23	concluded	11:2	
40:16	12:5	29:13	32:3 48:15	15:22	contrary
character	15:9,15, 18 16:10	42:21	48:15	19:6 31:7	11:9
ize	29:12	45:11,21	49:25	34:23	Control
35:17	33:2,6	companies	concur	35:20	3:17 4:5,
chastisin	34:21	23:24	36:18	39:22 49:1	7,10,17,
	39:17		conduct		23,25
<b>g</b> 45:11,12	40:10	companies	3:6 7:2,	confirm	5:3,9,13,
•	48:23	'	21 14:4	44:3	16,23
chatted	49:9,15,	23:25	39:21	confused	6:1,6,12
29:25	17,21	company	conducted	34:16	10:4,6
chatting	Clough's	21:13	32:2		11:5
30:23	8:25			consider	12:13
check	15:10,11,	compel	confer	15:5	17:19 19:15
38:12	12,16	11:13	3:6,11,15	considera	20:2
	16:20	17:2,12 24:8	6:21 9:8,	tion	28:23
Civil	39:7	28:25	11,15,17	22:11	30:4,5
6:25	co-ceos		10:15 11:2	consisten	45:16
clarifica	23:22	competent	12:24	t	
tion		13:22	13:1,3,5	42:17	convene
4:4	cocounsel	completed	16:8		39:11
-1	34:20	29:6	18:24	consisten	conversat
<b>clarify</b> 5:14 8:11	colleague	31:20	19:6	tly	ion
5:14 8:11	14:20	completel	20:25	46:8	4:19
	38:11	_	21:20	consolida	17:24,25
clear	44:13	<b>Y</b> 8:4 24:16	24:19	tion	18:24
3:9 6:24	come	38:21	25:2	28:16	19:3
7:1 13:15	13:17		29:24		34:18
14:21	30:22	complexit	36:20,21	contact	38:17
15:3	40:11	У	37:15,19,	14:22	39:14
23:1,2,		20:11	21 38:17,	contain	42:17
15,16 24:13,16,	comical 45:5	complianc	25 39:21	8:19	43:19 44:6 48:5
24:13,16, 24 34:24		e	41:24 42:1,7,	contained	
39:2	coming	9:3	10,12,19	6:10	conversat
42:7,10,	34:11		43:7,13,		ions
12,24	39:13	computer	22 44:9,	context	45:24
	comment	32:21	16 45:2,3	3:21 7:3 10:21	coordinat
client	39:25	38:3,11	46:13,20	27:8	e
14:3	communica	concern	47:4,11,		5:17 30:3
48:19		6:20 8:24	15,21	continue	35:22
	tion	I	49:3	35:1,24	1

coordinat	created	47:10	depending	34:24	difficult
ed	7:8	1	10:16	37:25	30:15
	22:17,20,	days		39:9,24	
4:20	22.17,20,	39:13	depo	40:5	direct
copied		dead	4:24	48:9,12,	13:13
7:15	creator	11:10	13:19	14	26:5
сору	24:3	1	28:16		directed
10:3,22	critical	deal	36:12	depositio	14:10
26:21	42:20	11:23	deponents	ns	
49:12		12:8 47:2	18:19	3:22,24	directly
	crunch	dealing	27:10,12	4:12,14,	26:5
corporati	49:4	27:19		17,18	director
on	cuff	46:6	depos	5:5,6,17,	37:6
30:20	35:10		25:10	18 17:13,	43
correct		dealt	28:17	15 18:18	directors
27:2 32:7	cut	18:5	43:22	19:19	18:25
36:10	8:12	debate	depose	20:12,13	19:1,2,10
		9:20	5:11	27:3,6,21	22:17,19
correctly	D	deed	20:3,4	28:5,20	21 23:8,
5:20		43:10	21:9,12,	29:11,15	18,19,21 23 24:3
costs	damages		17,19	30:22	23 24:3
21:25	23:14	deem	22:1 24:2	31:2	disagree
		22:1	36:9 37:8	35:21	17:16
counsel	Darlene	definitel	45:22,25	36:11	23:7
4:20 5:4	12:11	1	deposed	37:24	disclose
9:13 10:2	date	<b>Y</b> 38:15	41:14	38:20	10:6
19:12	8:19	1		39:16	14:25
couple	47:17,22	definitiv	deposing	40:4	15:2
12:6		e	19:24,25	41:19	
43:13	dated	10:25	22:8 28:8	45:3	disclosi
	7:16 9:1,	4-1-1	depositio	desire	g
course	2	deliberat	n	6:20	14:14
43:5	dates	e	3:21,22	determine	disclosu
court	27:3	8:5,8	5:21,22	28:14	
3:8	29:17,22	14:16	10 10:5	31:23	<b>e</b>
11:21,23	35:6,8,	deliberat	13:24	48:17	14:11,24
13:16	21,24	ely	14:1,6,7		disclosu
14:18	36:4	7:20 8:1	15:4,7	determini	es
26:19	38:10,23	11:3	18:21	ng	5:8 10:7
29:3	39:24	1	19:11,13	11:17	discover
35:2,7	40:6	delivered	20:6,18,	diatribe	
38:18	47:18	23:5	23 21:22	15:16	d
42:20	48:9,11	25:16	22:14,24		10:4
48:8	day	departmen	23:3,4,17	differ	discover
49:12,15,	15:19	l t	24:22	38:19	18:2,4,7
17,19,24	16:9 20:9	22:16,20,	25:8,22	different	8 20:20,
court's	35:5	23 23:10,	28:9	4:2 9:13	21 28:24
11:22	36:13	12 24:4	30:7,17	17:5,7	29:6
	39:21	38:8	31:2	44:20	36:11
	39.71				



		I	1		
39:13	14:11,15	43:12	34:15,25	enjoying	34:15,25
discredit	21:22	44:11	37:4 38:2	48:2	39:2
44:17	23:7 41:2	dutiful	41:2,22,	equally	exclude
	45:9	43:10	23 42:21	34:13	33:11
discuss	46:10	43.10	43:2,9,18	34.13	
5:17	documente		47:14,16,	error	excluded
16:16		E	20	8:9 39:5	9:22
31:22	d 15		emailed	et	excuse
34:23	38:15	each	7:14	7:9 17:24	43:21
37:24	documents	44:22		18:13	
42:8	25:18		emails		exercise
44:10	doina	earlier	5:12	evaluate	8:3 47:9
discussed	doing	16:12	8:15,19	8:23	exhibit
3:9 19:20		49:3	10:14,19	even	8:3 15:5
37:1	27:8	early	11:10	4:24 10:8	
43:16	30:17	10:8 49:3	15:24,25	14:20	expedite
46:15	46:2 47:2		17:18	17:19	49:12
	done	easily	29:15		expedited
discussin	7:19	19:21	36:19	ever	49:23
g	11:3,18	easy	37:14,17	4:24	
42:13	12:11	20:18	38:4,10	everybody	explain
discussio	15:22	   edificati	42:10,11,	18:4,9	8:11
	19:22		18 43:19,	26:19	32:10
n c o 7 o	21:15	on	24 44:7	41:23	exploring
6:3 7:3	25:24	13:20	46:16	47:14,17,	7:7
20:20	34:19	educated	employee	23	
29:8 34:13	40:9 49:3	43:6	17:10		express
34:13	Donrey		_	everyone	14:23
19 36:23	16:24	effectuat	employmen	49:7	34:17,25
		ed	t	everythin	expressed
Ι //・Ω	l _			0.0-7.0	expressed
44:8	Dorney	25:19,24	3:18 4:7		5:2 8:24
47:21	Dorney 16:22	25:19,24 26:16	3:18 4:7 6:10 11:5	<b>g</b> 15:21	_
	_	1	6:10 11:5	g	5:2 8:24
47:21	16:22  Dovetaili	26:16	6:10 11:5 end	<b>g</b> 15:21	5:2 8:24 14:2,6,17
47:21 discussio	16:22  Dovetaili ng	26:16 either	6:10 11:5	g 15:21 33:11	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7
47:21 discussio	16:22  Dovetaili ng 28:20	26:16 either 6:9 8:13	6:10 11:5 end 18:7 20:8	g 15:21 33:11 42:3	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18
47:21 discussio ns 8:7 9:22	16:22  Dovetaili ng 28:20  down	26:16 either 6:9 8:13 10:16 11:12	6:10 11:5 end 18:7 20:8 25:2 35:5	15:21 33:11 42:3 48:24 49:2	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24
47:21 discussio ns 8:7 9:22 10:17,18	16:22  Dovetaili ng 28:20	26:16 either 6:9 8:13 10:16 11:12 else	6:10 11:5 end 18:7 20:8 25:2 35:5 39:20 49:9	15:21 33:11 42:3 48:24 49:2 evidence	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25	16:22  Dovetaili ng 28:20  down	26:16 either 6:9 8:13 10:16 11:12 else 4:9 12:3	6:10 11:5 end 18:7 20:8 25:2 35:5 39:20 49:9 endeavor	15:21 33:11 42:3 48:24 49:2	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21 39:8
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25 disdain	16:22  Dovetaili ng 28:20  down 4:8 41:3	26:16 either 6:9 8:13 10:16 11:12 else	6:10 11:5 end 18:7 20:8 25:2 35:5 39:20 49:9	15:21 33:11 42:3 48:24 49:2 evidence	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25 disdain 14:23	16:22  Dovetaili ng     28:20  down     4:8 41:3  drafted     9:19 29:1	26:16 either 6:9 8:13 10:16 11:12 else 4:9 12:3	6:10 11:5 end 18:7 20:8 25:2 35:5 39:20 49:9 endeavor	15:21 33:11 42:3 48:24 49:2 evidence 32:13,15	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21 39:8 42:16
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25 disdain	16:22  Dovetaili ng     28:20  down     4:8 41:3  drafted     9:19 29:1 due	26:16 either 6:9 8:13 10:16 11:12 else 4:9 12:3 49:7	6:10 11:5  end  18:7 20:8  25:2 35:5  39:20  49:9  endeavor  31:8	15:21 33:11 42:3 48:24 49:2 evidence 32:13,15 example 33:10	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21 39:8 42:16 expressin
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25 disdain 14:23	16:22  Dovetaili ng     28:20  down     4:8 41:3  drafted     9:19 29:1	26:16 either 6:9 8:13 10:16 11:12 else 4:9 12:3 49:7 eluded 30:25	6:10 11:5  end  18:7 20:8 25:2 35:5 39:20 49:9  endeavor 31:8  ended 16:8	15:21 33:11 42:3 48:24 49:2 evidence 32:13,15 example 33:10 examples	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21 39:8 42:16 expressin g
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25 disdain 14:23 dispersio	16:22  Dovetaili ng     28:20  down     4:8 41:3  drafted     9:19 29:1 due	26:16 either 6:9 8:13 10:16 11:12 else 4:9 12:3 49:7 eluded 30:25 email	6:10 11:5  end  18:7 20:8 25:2 35:5 39:20 49:9  endeavor 31:8  ended 16:8  engaged	15:21 33:11 42:3 48:24 49:2 evidence 32:13,15 example 33:10 examples 37:5	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21 39:8 42:16 expressin g 17:25
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25 disdain 14:23 dispersio ns	16:22  Dovetaili ng 28:20  down 4:8 41:3  drafted 9:19 29:1  due 6:24	26:16 either 6:9 8:13 10:16 11:12 else 4:9 12:3 49:7 eluded 30:25 email 7:16,19	6:10 11:5  end  18:7 20:8 25:2 35:5 39:20 49:9  endeavor 31:8  ended 16:8  engaged 14:4	g 15:21 33:11 42:3 48:24 49:2 evidence 32:13,15 example 33:10 examples 37:5 exchange	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21 39:8 42:16 expressin g
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25 disdain 14:23 dispersio ns 42:5 44:12	16:22  Dovetaili ng 28:20  down 4:8 41:3  drafted 9:19 29:1  due 6:24  duplicate 41:19	26:16 either 6:9 8:13 10:16 11:12 else 4:9 12:3 49:7 eluded 30:25 email 7:16,19 8:14,20	6:10 11:5  end  18:7 20:8 25:2 35:5 39:20 49:9  endeavor 31:8  ended 16:8  engaged 14:4 18:12	g 15:21 33:11 42:3 48:24 49:2 evidence 32:13,15 example 33:10 examples 37:5 exchange 12:21	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21 39:8 42:16 expressin g 17:25
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25 disdain 14:23 dispersio ns 42:5 44:12 distills	16:22  Dovetaili ng     28:20  down     4:8 41:3  drafted     9:19 29:1  due     6:24  duplicate     41:19  during	26:16 either 6:9 8:13 10:16 11:12 else 4:9 12:3 49:7 eluded 30:25 email 7:16,19 8:14,20 12:15,16,	6:10 11:5  end  18:7 20:8 25:2 35:5 39:20 49:9  endeavor 31:8  ended 16:8  engaged 14:4 18:12  enjoyed	g 15:21 33:11 42:3 48:24 49:2 evidence 32:13,15 example 33:10 examples 37:5 exchange	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21 39:8 42:16 expressin g 17:25 expressio
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25 disdain 14:23 dispersio ns 42:5 44:12 distills 41:3	16:22  Dovetaili ng     28:20  down     4:8 41:3  drafted     9:19 29:1  due     6:24  duplicate     41:19  during     7:9 10:5,	26:16 either 6:9 8:13 10:16 11:12 else 4:9 12:3 49:7 eluded 30:25 email 7:16,19 8:14,20 12:15,16, 19,20,21	6:10 11:5  end  18:7 20:8 25:2 35:5 39:20 49:9  endeavor 31:8  ended 16:8  engaged 14:4 18:12	g 15:21 33:11 42:3 48:24 49:2 evidence 32:13,15 example 33:10 examples 37:5 exchange 12:21 47:7	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21 39:8 42:16 expressin g 17:25 expressio n
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25 disdain 14:23 dispersio ns 42:5 44:12 distills	16:22  Dovetaili ng 28:20  down 4:8 41:3  drafted 9:19 29:1  due 6:24  duplicate 41:19  during 7:9 10:5, 14 13:23	26:16 either 6:9 8:13 10:16 11:12 else 4:9 12:3 49:7 eluded 30:25 email 7:16,19 8:14,20 12:15,16, 19,20,21 15:14,20	6:10 11:5  end  18:7 20:8 25:2 35:5 39:20 49:9  endeavor 31:8  ended 16:8  engaged 14:4 18:12  enjoyed	g 15:21 33:11 42:3 48:24 49:2 evidence 32:13,15 example 33:10 examples 37:5 exchange 12:21	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21 39:8 42:16 expressin g 17:25 expressio n
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25 disdain 14:23 dispersio ns 42:5 44:12 distills 41:3	16:22  Dovetaili ng     28:20  down     4:8 41:3  drafted     9:19 29:1  due     6:24  duplicate     41:19  during     7:9 10:5,	26:16 either 6:9 8:13 10:16 11:12 else 4:9 12:3 49:7 eluded 30:25 email 7:16,19 8:14,20 12:15,16, 19,20,21	6:10 11:5  end  18:7 20:8 25:2 35:5 39:20 49:9  endeavor 31:8  ended 16:8  engaged 14:4 18:12  enjoyed	g 15:21 33:11 42:3 48:24 49:2 evidence 32:13,15 example 33:10 examples 37:5 exchange 12:21 47:7 exchanges	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21 39:8 42:16 expressin g 17:25 expressio n
47:21 discussio ns 8:7 9:22 10:17,18 33:19 35:25 disdain 14:23 dispersio ns 42:5 44:12 distills 41:3	16:22  Dovetaili ng 28:20  down 4:8 41:3  drafted 9:19 29:1  due 6:24  duplicate 41:19  during 7:9 10:5, 14 13:23	26:16 either 6:9 8:13 10:16 11:12 else 4:9 12:3 49:7 eluded 30:25 email 7:16,19 8:14,20 12:15,16, 19,20,21 15:14,20	6:10 11:5  end  18:7 20:8 25:2 35:5 39:20 49:9  endeavor 31:8  ended 16:8  engaged 14:4 18:12  enjoyed	g 15:21 33:11 42:3 48:24 49:2 evidence 32:13,15 example 33:10 examples 37:5 exchange 12:21 47:7 exchanges	5:2 8:24 14:2,6,17 15:9 19:24,25 28:7 29:18 33:24 36:21 39:8 42:16 expressin g 17:25 expressio n



					1
overeggie	25.7	   fine	20.15	frankly	7.10
expressio	35:7	12:8 20:4	30:15	27:19	7:12
ns	fault	12:8 20:4 35:20	31:5,7,		10:3,5
14:9	29:2 39:6		17,18,19, 21 32:8,	from	11:5 12:12
39:12	favor	finish		3:25	17:12
expressly	15:18	8:9	11,22 33:3,20	4:13,14,	19:15
7:10		first	34:8	15,24 5:8	20:2
	federal	7:18 8:1	35:1,2,	8:6 9:18,	28:23
extent	6:25 29:2	9:6 10:4	15,19,21,	22 10:3,	30:4,5
3:9 6:12	fee	12:5,10	24 36:10	19 11:21,	45:16
11:11,18	47:2,4	20:10	38:25	25 13:11	43.10
		32:8 35:8	39:4,15	14:11	garner
F	feel		40:17	15:1,2,14	14:19
	33:17,23	fit	41:18	16:6 18:8	gave
fact	45:1	8:11	42:10	22:3	24:20,21
3:24	feeling	flesh	43:21	28:19,22	37:4
10:14,25	44:15	6:21	44:9,19	30:1,2,10	
15:15			47:2,8,9,	32:7	GCB
16:19	fees	flux	15	39:7,23	36:10
20:12,21	21:25	27:16		40:6,7,8	generally
22:22	few	folks	forget	41:1,9,20	6:18
27:3,5,	3:16	40:7	37:5	45:14	20:20
20,23	40:13		form	46:7,23,	31:18
29:17,21		follow-up	11:8	24 48:22	
30:14,17	field	9:15		front	get
31:21	22:4	47:14	formal	26:21	3:5 6:3
35:6,11,	figure	following	27:25		9:10
15,22	40:15	44:8	forth	frustrate	10:25
36:6,22,	42:3		9:13	d	16:1 19:8
24 38:20	file	for	12:17	47:24	20:19,25
39:24		3:11 4:4,	14:4	48:3	21:1,7
41:17	26:19	6 6:7,8,	29:16	fully	27:23
42:25	files	17 9:3,20	30:12	13:22	31:13
43:4,8,	3:18 4:7	11:13,16		29:2	32:24
16,22	6:10 11:5	12:12	forward		39:1
45:4	17:10	13:7,17,	22:24	further	40:6,7
46:14,17	filing	20,22	25:3	8:23	42:6
47:21	filing	15:18	31:10	future	48:16
48:12,14,	21:23	17:17	32:4	5:18	49:2,22,
18	finalize	18:4	34:11		23
	29:23	19:4,13,	40:4		get all
failure	46:12	17 21:16,	41:21	G	4:20
6:22 7:18	finalized	23 22:8,	47:22		29:17
11:1	29:25	10,23	49:2	gaming	32:2
far	40:18	24:11,21	four	3:17 4:5,	
27:20		26:4,21	43:14,15	7,9,16,	gets
28:4,24	find	27:3,6		23,25	15:22
29:10,20	44:20	28:3,17,	frame	5:3,9,13,	29:4
30:20	finding	25 29:3,	31:19	15,23	getting
33:20	33:14	8,17,23	38:22,23	6:1,6,12	16:5 30:6
	]				
	I	I	1	I	I

40.01	15.00	26.25	harassing	41 2 4 5	21 00
48:21	15:20	26:25	25:1	41:3,4,5 47:2	31:22
give	17:10	47:9	25:1	4/:2	32:4,10,
7:3 9:1	20:14,15	guess	hash	hey	23 40:15
12:1	21:2,4,5	29:9	34:17	12:14,20	However
29:13	24:20,22	32:3,21	harring	30:3 39:4	34:18
31:25	27:4,17	39:20	having	42:24	
ai	28:2,16,	40:8	16:15 33:18	46:3,4	
given	19,22	guidance		hiding	I
11:15	29:1,3,15	27:24	35:2,18 36:20	46:6	
21:18	30:11,14,	27:24		46:6	idea
22:22	19 34:16	Gutierrez	38:25	himself	22:3 48:6
28:10	35:14,23	8:21	39:14	14:20	ideas
29:6	36:7 40:3		46:19	hald	14:1
37:16,18	41:10,11,	guy	headway	hold	
38:23	16,18,21	46:24	6:15	25:11	identifie
39:12,24	42:1,6	guys	haam	42:11	d
40:23	46:12	5:3 17:1	hear	48:25	19:20
48:11	47:2,4	23:6	32:18	honest	36:24,25
gives	gone	33:22	39:18,19	21:3	
7:20 9:23	27:13	34:1,13	heard	Hornbuckl	identify
10:21	28:10	39:18,23	5:1 18:9		32:23
alobal	40:24	42:11,18	33:25	е	identity
global 33:18		43:24	hearing	3:19 5:22	5:7,13
33:18	good	47:6,7,	15:6	18:22,25	37:11
go	33:10	16,17,18	13:0	19:12	if
8:9 12:9	47:13	48:8,11	heated	20:3,10,	3:12 4:1,
17:18	48:6		7:4	18,23	2,5,10,24
19:18	49:24	н	held	21:7,9	
22:24	gosh		43:13	22:2,7,	5:13,19, 23 12:14
24:9,18	16:7			13,18,24	13:12
25:3,10	33:25	hadn't	helpful	24:1	15:4,6,21
28:23	46:23	40:11	41:7	28:21	
31:9	and the second	handle	here	Hornbuckl	16:22
36:19	got	27:23	4:10	e's	18:2,10
39:23	12:15 16:12		10:14	19:13	20:4 21:19
40:4,6,7,	18:9	happen	12:9	23:5	21:19
14 41:9,	26:20	13:1	13:16	37:25	25:18
13 42:2	36:16	happened	14:10,18	39:9	25:18
45:15	39:4,18	8:23 11:6	16:21		28:15
46:12	39:4,18 40:12	12:17	18:1,16	host	30:11,14
47:22	40:12		19:6	3:7,12	
48:22	40:1,4,11	happening	24:14,15	22:18	31:12,13 32:7,24
God	gotten	27:18	28:9	23:13	33:20
44:13	35:6	46:23,24	31:11	how	34:8
	grave	happy	45:6,12	3:23 7:8	35:16,19,
going	7:6,20	35:17	48:24	11:22	25 36:7,
3:16,20	9:23			14:12	13 37:17
6:14 8:12		harass	here's	19:1	38:10
13:6	great	21:15	16:20	25:13,19	40:1,2,5
					40:1,2,3
L					



				l	
41:5,7,10	27:1,7,	34:7,15	16:4	interest	16:17
42:8,18	10,14,16,	43:24	18:13	19:24,25	18:3
43:13,14	18 28:1,	46:16	input	28:7	20:11
45:10,11,	7,17	including	6:4 49:7	interject	21:1
13 46:5	29:5,7	10:20		7:25	22:10
49:7	30:7,14,	44:7	instructe		28:20
immediate	16 31:8,	45:21,23	d	interject	29:8 32:4
	25 32:13		14:3	ing	38:1
ly	33:3,13	incorrect	insular	13:24	39:24
13:2	34:2,7,	4:11	20:10	interject	41:21
impasse	15,24	independe	20:10	1	issued
17:3,9	35:7	nt	insult	ion	3:17,19
22:25	36:5,20,	23:25	44:19	48:24	5:21,25
impontant	23 37:4,		insulting	interpret	9:19
important 11:17	12,14,17,	33:22	44:21	17:4,5,6	10:23
32:13	24,25	34:5,6 45:7	44:21		28:22
32:13	38:4,7	45:/	intent	interpret	37:6 38:1
imposing	39:2,13	indirectl	21:18,20	all	
13:25	40:16,24	y	intention	21:14	issues
improper	41:17	26:5	13:11	interrupt	3:7,13,
22:2	42:3,6,		25:12	8:13	16,20,21,
22:2	19,23	individua		25:12	22 4:5
in	43:3,9,24	ls	intention		6:5,21
3:4,21	44:20	5:14	ally	investiga	11:16,22,
4:3,6	45:21,23	23:13	11:18	ted	24 18:2
5:7,9,18	46:16	27:9	18:13	43:12	19:7
6:10,12,	48:8,19	41:16	21:16	involved	20:11,16
23,25	inadverte	inform	interact	4:21 5:9,	34:4 36:1
7:9,11,	nt	14:15	34:1,2	24 10:17,	40:1
16,17,21	8:4,5,8	46:1		18 18:23	it
8:2,15,25	39:5,8		interacte	19:3	3:7,9,14,
9:4,11,		informati	d	37:12	15 4:12
15,16,25	inadverte	on	45:6		5:15,25
10:9,10,	ntly	6:7,9,17,	interacti	involving	6:15,16
14,17,18,	12:25	19 7:11		18:24	7:5,8,15,
20,25	16:4	8:6,22	ng	19:7	17 8:1,3,
11:2,7,8,	18:15	10:10	45:18	irrelevan	4,5,7,8,
16,17	inbox	22:9	46:1	t	10,25
12:19	42:23	23:13,16	interacti	24:17,25	9:12
14:1,4	42:23	35:12,16	on	· ·	10:1,14,
15:16,19		46:14	14:12	issuance	23 11:4,6
16:5 17:4	incident	48:17,22	34:5,6	9:9 21:19	12:7,20
18:11,12	37:12	initial		issue	13:1,2,10
19:3,9,	include	10:7	interacti	4:9 6:15	14:15,21,
24,25	15:7		ons	7:6	25 15:1,
20:20	18:20	innocent	15:11,12	10:13,16	2,3,17,22
21:9	45:19	8:6,9	33:18,20,	11:10,11,	16:3,8,
22:12		innocentl	21	12,25	12,13,18,
23:14	included	y		13:12,14	19,21,22,
26:1	9:16	1			
			ITAC™		



					notel, LLC, et al.
1	1	I	I	I	I
23,24	34:2	19 38:4,	26:15	14:4,5	let's
17:5,6	36:15	24 39:10	27:4,14	32:17,20	12:14
18:17,19	39:10	40:18	28:2,12,	33:5,7,8	15:3
19:10,14,	40:18,19	41:22	23 29:5,	36:4,15	24:9,18
15,22	42:20,23	42:2,15	17 30:11,	38:14,21,	25:3,10
21:7,19	44:12,16	48:24	12,16,24	24 39:15	42:9
22:4,11,	47:8,14	49:21	31:22	42:14	46:22
12 23:8			33:9,18,		47:1
24:2,16,	items	justifiab	25 35:16	Lawrence'	
20 25:9,	28:17	le	36:7 40:2	s	letter
15,22,23,	itself	21:16	42:24	12:18	8:2 9:1,
24,25	6:11	justified	45:10	39:12	4,5,7,9
26:2,3,6,		25:7		42:16	12:15
12,15,19			knowing	lawsuit	41:2
28:4,25	J		11:6	3:4	45:14
29:16,25		K	30:14		letters
30:1,8	join		knowledge	lawyer	8:18
34:14,18,	6:12 30:7	Katie	21:11	17:21	45:10
21,24	jump	31:8 33:7	43:6	lawyers	licensee
38:19	4:3 28:7	36:9,14	known	17:22	7:12
39:2,7,8,	36:5	38:14	9:18 10:7	33:19	
18 42:9,		41:7	).10 10.7	learned	light
10,12,22	juncture	keep		16:6	44:18
43:15,23	22:25	13:11	L		like
44:14,17,	June			least	14:9,12,
18,20,22	36:12	kept	L.J.	41:13	22 17:7
45:15,20,	jurisdict	13:24,25	3:4 12:6	leave	20:9 25:4
23 46:5,	-	15:1,2	40:11	13:6 29:8	29:24
15,22,23,	ions	kind	language		34:5
24 47:1,	44:20	3:24 4:3	17:8	led	36:6,12,
3,5,19	just	29:13,20,		23:13	16 38:22
48:6	5:1 9:24,	24 30:8,	last	left	39:10
49:5,7,	25 12:6,	15,25	17:15	15:15	40:14,22
20,21,22,	17 13:20	41:20	18:18,19	22:4	41:6
23	17:20	48:24,25	late	27:15	44:22,25
it's	20:24	   kinds	31:7	36:16	45:10,20,
4:6 5:24	21:1	41:19		41:8	23 47:12
13:14	24:18		law	less	49:8
14:17	25:3,4	know	6:18	39:13	limit
16:10,14	26:21	4:1,19,24	17:4,5,8		40:15
18:16	27:19	5:10,12,	18:11	let	
21:2,10,	28:12	22 6:14	26:4,7	7:24	line
11 22:4	30:8,25	9:25	44:19	13:10	30:16
24:5,16,	32:6,20	10:19,24	lawfully	20:4,5	lines
18,25	33:14,16,	13:10	26:10	27:4	36:4
25:1 28:6	17,24	14:9,12,	Lawrence	33:25	
30:15	34:4,5	22 20:14	9:14	40:2 41:7	list
32:21	35:20	22:3	12:18	42:24	33:14
33:14	36:5,15,	25:11,13	13:21		36:6
			19.21		
	<b>I</b>	I	I TA OTM	l	I



	Ī	I	I	I	I
listed	Maier	9:1,23	meet	18:25	misspoke
5:12	8:20	10:4,11	3:6,10,15	19:13,16	12:21
listen	make	12:11,24	6:21 9:8,	20:1	mistake
39:4	6:14	13:12,17	11,15,16	22:19	8:9 15:17
	15:3,22	14:6,11,	10:15	23:20,22,	16:5
litigatio	17:1,3	14,15,20,	11:2	24 24:1,3	18:14
n	32:14	25 15:2,	12:24	32:7	
34:3	37:16	24 18:10,	13:1,3,5	33:21	mistaken
little	46:5	22 19:4	16:8	39:16	4:6 16:23
12:7		24:17	18:24	43:10	23:4
29:3,14	makes	25:5	19:6	MGM's	mistakenl
	48:15	26:7,14	20:25	5:4	У
live	malfeasan	27:2	21:20		16:20
36:5	ce	29:20	24:19	MGM00041	
logical	18:12	31:25	25:2	22:15	moment
48:4		32:7,18	29:24	Michael	9:2
	manager	34:25	36:20,21	12:13	month
long	37:10,11,	35:21,23	37:15,19,		43:23
21:3	12 38:6,8	39:18	21 38:17,	midweek	44:6,9
33:20	mandates	40:2,24	25 39:10,	31:7	46:15
look	17:24	42:5	21 41:24	Mike	
27:22		43:21	42:1,7,	28:6	more
31:9 41:6	manner	44:12,14,	10,11,19	31:5,10	27:1
45:18	17:4	17,18	43:7,13,	32:5	29:14
1 1- 2	March	45:9,16	22 44:9,	mind	31:25
looking	7:5,13	46:2,9,	16 45:1,3	23:18	36:2
32:8,11	9:2,3,4,	10,11	46:13,19,		38:12
36:16	6,9 10:23	49:18,19,	20 47:4,	minded	45:15
40:17	16:5	21,23	11,15,21 49:2	22:12	most
looks	18:15	mean	49:2	mine	24:1
36:6	   mark	17:22	meeting	39:7	48:15
lot	8:3	20:24	3:8 32:1		motion
20:11		21:11	43:1,3	minutes	
27:17	matter	26:20,25	member	35:19	3:11
27.17	10:9	27:1	19:1,16	mischarac	11:13,16 17:11,12
	15:19	28:15	23:17,19	terize	21:5,23
M	16:13	30:16		40:1	23:6
	17:11	33:19	members		24:6,7
madam	21:11	34:12	23:21,23	misdeed	25:4
49:11,17	23:9	35:5	mention	14:16	27:17
	33:14	36:5,12	13:19	misidenti	28:21,25
made	44:23	40:21		fied	29:7 36:2
8:15	maybe	48:4,7	merely	23:11	40:3,19,
13:25	4:15 5:2,	meanie	45:14		23 41:10,
16:4 23:1	10,11	46:25	meshed	misinform	11 42:3
24:12,16,	9:20		33:13	ed	
24 34:24		meaning		23:12	motions
35:9	me	5:3 16:15	MGM	misplaced	24:19
42:10,12	7:20,24	23:22	3:4 5:8	34:21	28:24
	Ī	I	i .	J4:∠⊥	1



					·
move	3,23	32:3,20	named	14:2	33:16
12:3	49:6,9,	34:20	18:18	17:23	47:6
17:1,2	10,11,14,	37:4,17	19:20	18:9 26:2	Nona's
32:4 49:1	15,17,21	38:3,11	narrow	43:1,2	31:5
moved	Ms	39:5	narrow	novt	31:5
		40:14	4:8	next	nonethele
32:20	9:14	41:20	near	13:23	SS
Mr	12:23	42:10,18,	5:18	16:9	15:9
3:3,5 4:4	13:21	21 43:9,	need	17:13	34:22
6:4 7:4,	14:4,5	18,19,24		26:13	
22,23,24	15:11,12,	44:13	3:10	31:7	nor
8:7,10,25	25 16:1,7	46:16,23	5:16,17	34:10	8:12 9:10
9:5,14	30:2	47:2,4	8:22	35:20	not
12:5	32:17,20	48:5,13	11:12	39:11,22	4:3,5
13:8,20,	33:5,8		15:4,6	42:1	5:24
23 14:6	36:4,15		19:2,5	46:21	7:14,15
15:9,10,	38:14,21,	N	20:24 24:14	47:1,5,	8:4,12
11,12,15,	24 39:12,			10,18,19	9:16,24
16,18	15 42:14,	Nahabedia	25:11,13,	48:4 49:3	10:10,22
16:1,10,	16	l n	18 27:7,	NGCB	12:25
20 17:14,	much	4:4 7:22,	23 30:3	17:10	13:10
16 18:25	11:11	24 13:8	41:13		14:3,4
19:5,10,	14:12	16:1	48:8,17	nine	15:10,13,
12,13	34:18	17:16	49:12,22	36:8	24 16:1,
20:3,7,10	47:6	19:10	needs	no	5,23
22:2,7,	multi	22:15	14:7	6:8 7:23,	19:13,14
15,18,24	34:3	24:12	18:23	24 8:19	21:4,12
23:5,14		25:21	29:6	13:25	23:4,21,
24:1,10,	multiple	26:17,24	40:19	17:17	22 24:14,
12 25:11,	17:20	33:16	negative	18:4	15,20,22
21 26:14,	my	36:14,18	42:5	19:17	25:12,16
17,20,24,	3:3,25	37:22	44:12,18	20:25	26:5
25 29:12	6:20 8:6,	38:3	45:8	21:10,16	27:5,11
30:1 31:4	17,24	41:22	43.0	24:10,14	28:16
32:5,19	10:10	44:4	neither	29:2	29:23
33:2,6,16	11:25	47:13	33:17,22	34:4,5	30:4,12
34:21	13:10	48:1	Nevada	35:6	31:24
35:4	14:20	49:14	4:7,9,16,	36:15	32:19,21
36:14,18	15:14,21	   Nahabedia	23,25	39:6,10	33:11,18
37:20,22,	16:7		5:3,9,13,	45:8	34:2,10,
23 38:3,	18:2,3,5	n's	15,23 6:1	46:4,19,	16 35:10,
14 39:7,	20:8	34:19	12:12	21 49:21	25 36:8
9,15,17,	21:10,11	name	17:19	nobody	39:25
19 40:10,	22:10	3:3	19:14	18:8,12	40:2,18
21 41:22	24:12,22	12:10,18	20:2		41:7,10,
42:14	25:12,14	15:16	30:3,5	Nona	18 42:1,
44:2,4	28:6,19	34:19	45:16	12:13,18	13 43:4,
47:6,11,	29:16	37:5		28:6	14 44:16,
12,13,20,	31:1		never	31:10	22 45:9,
24 48:1,			10:1,6	32:6,16	13,16
	•		i e		i e



Tyleet and Come	•		Shawii i adiila	v. Wow orang	
46 0 10	17.10.10	obtain	10 1 0	24.25	14.0
46:9,10,	17 19:18		19:1,2,	24,25	44:9
14 48:1,7	20:2	11:4	11,16,18	49:20	on
notes	24:5,9	obviously	20:6,7,8,	off	3:12,20
40:14	25:9	3:10 5:16	11,16,19,	8:12 19:8	4:2 5:12
	26:13	6:5 11:20	22 21:2,	20:25	6:4,15
nothing	27:14	12:18	7,14,19,	27:15	7:4,13,15
6:1 39:20	28:10	17:3 21:8	21 22:4,	35:10	8:9,12,13
40:24	31:12	27:18	17,18,19,	41:8	9:6 10:8,
45:15	35:18	29:14,19	20,24		16,23
49:9	37:4,13	31:15	23:3,8,9,	offer	11:13,14
notice	38:10,16	32:13	13,17,18,	29:10	12:4,20
5:21 6:23	41:24	38:22	21,23,25	48:5	13:2
7:15,19	42:7,8,	41:18	24:3	offhand	14:3,8,
9:10 10:2	15,18	47:24	25:2,17	28:12	10,17
11:1	43:1,2,	48:6,19	26:8,15,		15:6
15:13	10,18,22	49:4	18,21,22	office	17:22,25
18:21	45:2,17		27:6,8,9	4:15 7:14	18:5,9,
19:11	46:12	occasions	28:8,16	8:16,17,	20,23,25
20:6 23:3	nowhere	36:22	29:2,13,	20 10:18,	
24:22	42:6	occurrenc	17,20,22,	20 11:15	19:6,17
	42:6		24 30:7,	13:9,12,	20:5
25:22	number	e	8,15,17,	13,14,23	24:19
26:18	11:25	34:2	25 31:1,	14:12,13,	25:11
28:9	17:9	of	23 32:2,	14,23	26:21
37:17		3:5,7,13,	13,25	15:10,13,	27:23,24
41:15		21,24	33:11,14,	17 16:9,	28:1,19
48:9,14,	0	4:3,13,18	17,22	11,20	29:19
20		5:6,7,13,	34:7,17,	18:3,6,8,	30:12
noticed	object	14,21	19 35:5	14,16,20,	31:6,21
5 <b>:</b> 7	16:21,22,	6:3,9,11,	36:4,22,	21,23	32:2,4
	23,24	17,20,23,	23,24,25	19:2,7,	34:19
notices	-1	24,25	37:2,6,8,	14,21,22	35:3
48:13	objected	7:1,4,5,	9,11,17,	23:5	36:12,21
notify	10:8	7,10,15,	19,21,23,	25:16	38:2,12
46:9	objecting	17,19	24 38:10,	29:16	39:1,11
	40:18	8:2,18	20,25	30:4,5,11	40:12,24
notwithst	-1-44	9:7,9,10,	39:1,5,7,	31:17	42:2
anding	objection	25 10:3,	10,12,16,	32:6 37:1	43:6,7,20
15:15	6:13 8:18	5,7,8,22	17,21	39:7	44:6,8
16:19	9:4 11:15		41:2,12,	45:7,14,	45:2,3
33:23	13:25	11:4,12,	19,20,23	15,20	46:20
now	14:13	19 12:1,	42:9,16,	46:3,6,7	47:15,22
13:8,12	objection	9,16,23	22,23		48:21,25
	s	13:7,10,	43:5,6,8,	office's	49:4,9,12
14:22	13:24	15 14:1,		15:12	once
15:18	35:25	11,19	16,18,20,	16:3 45:8	15:10
16:10,11,		15:7,13,	21 44:15	officers	13:10
13,14,15,	obligatio	19 16:5	45:7,19	23:23	one
17,21	n	17:11	46:16		3:17
17:1,13,	21:1	18:7,10,	47:8,9	old	4:11,22
18 18:2,		11,21,25	48:7,17,		
		l			

	I	I	1		
9:1 10:5	29:1	49:9	22:2	31:15	28:19
11:25	40:16			34:3	39:23
17:10,21,	l	ours	own	45:18,25	40:8
25 18:5	original	42:17	20:5,6	46:1	41:1,20
19:5 21:7	29:24	out	23:7,24		
29:1,9	originall	5:12 6:2,	39:12	party	perspecti
30:17		21 15:16,		17:20,21	ves
	У	20 16:8	P	33:12	23:25
31:16	11:7,8		P	nagt	
33:12,17,	12:12	17:18		past	pertain
22 35:17	43:11	20:5,19	p.m.	36:23	17:18
37:5	other	21:1,7	7:17	pay	19:13,14,
38:24	5:6 6:15	22:4 23:2	D-4411-	47:2,4	23
40:10	9:13	24:6	Padilla		pertains
48:24	10:12	25:21,23	3:5 23:14	people	19:10,11,
49:18		26:2,12,	page	5:11	
one-off	11:21	18 33:4,	9:7	19:24	12,15
10:1	12:4	14 34:17		22:19	phone
10:1	15:18	39:4,6	paragraph	25:3	19:8 39:1
only	16:18	40:15	7:18 8:2	33:15	
18:14	19:20	41:23	9:6	37:2,18	picture
23:18	20:12	42:3,11	part	39:16	3:25
41:11	21:25	44:4	4:18 5:15	43:25	piece
	22:18	47:13,23	6:20 8:2	46:17	32:13
open	23:21,23	48:12,20	10:6 15:6		
22:12	29:9			percent	place
29:8	34:14	over	19:2	36:19	8:22 9:15
38:11	44:22	15:23	37:23	perfect	10:22
operator	46:1	24:19	41:23	24:1	13:19
37:7	others	27:13	42:9,23		plaintiff
	27:18	28:11	43:16,20	perfectly	3:23 11:3
opportuni		31:13	partial	21:3	23:11
ty	Otherwise	40:5	41:11	perhaps	31:18
12:2	41:10	43:14,15,		13:13	
annaga	01176	23 44:6,	participa	42:21	plaintiff
oppose	our	8,20	nts		's
17:2 26:3	4:18,22	46:15	9:11	person	6:22 10:2
opposed	5:20 6:5	49:22	participa	20:1 24:2	
48:7	10:15	overlap		37:5,8,13	player
opposition	11:14	4:16,22	te	38:6	32:9
oppositio	17:3	4:16,22 5:1 27:25	11:2,15	personal	please
n	21:24		particula	21:10	7:24
14:2,24	22:6	28:14	r	22:9	18:11
17:12	23:1,15	31:16	10:9		19:3
24:7	24:7,19	35:23	20:17	25:16	22:10
orally	25:22	overly	30:21	persons	26:14,16
5:2	28:8 30:7	14:21		5:7 19:20	42:24
	31:21		parties	norgnost:	48:1
order	33:3,13	overseen	9:21	perspecti	49:2,13
11:14,16	36:8,9	22:22	16:14	ve	
17:12	43:25	overtly	17:20	3:25 4:13	point
21:24	45:24	1	21:4	12:1	19:9 20:8
	•	•	•	•	•

			1		
24:15	prepared	productio	prudent		reads
40:20	34:12,13	n	3:7	R	15:4
pointless	prepped	10:8	punting		real
24:25	40:7	21:22	45:4	Raffi	39:18
portions	present	Professio	purpose	4:1 6:5	realistic
11:4	46:10	nal	3:5 13:15	7:7,16 8:21	36:13
position	presented	7:1	34:7,15,	10:13	reality
6:6 13:25	46:9,10	professio	17 35:2	11:9	36:5
18:11	pretty	nals	37:19,20, 22,23	12:1,8,19	realizati
22:6	38:23	44:23,24	39:3	13:7 19:5	on
23:1,2,15	39:2 42:7	property	47:16	20:8	16:4
24:23,24	prevented	32:24	pursuant	24:11 25:11	
potential	46:23,24	protected	13:16	27:1	realized
27:3		6:8,9,19	26:10	29:14	15:17
potential	previousl	protectiv	put	34:19	
ly	<b>Y</b> 43:12	procedtiv	7:8 10:1	35:5 38:2	really 13:17
4:16 5:10		11:14,16	30:24	42:1	22:5
6:10	prior	17:12	31:9	44:12,13 45:6,7	34:16
29:21 30:18	37:16 43:1,7	21:23	48:25	46:4,23	39:11,14
		28:25		47:12,25	40:19
practice	privilege	provide	Q	49:22	44:21
3:11 21:5 25:4	7:6,12 9:21	6:22 7:18		Raffi's	45:5 47:7
25:4 27:17		11:1	quash	15:10,11	reason
28:21	privilege	18:10	17:1,11	39:6,23	3:13 5:23
29:7 36:2	d	26:6,7,14 27:24	question	40:8	13:18 17:17
40:4,19,	7:11 17:8	31:14	25:14	raise	18:4 20:9
23 41:11,	probably	35:14	37:10	10:12	34:8
12 42:4	5:14	43:5	38:5 43:7	range	39:14
practicin	33:13 40:3	provided	44:1	31:8	reasonabl
g		7:15 8:17	questions	rather	e
33:19	problem	10:2,10,	7:7	7:4 21:13	25:7
44:19	46:19,21	22 13:9	24:10,14 29:18	30:22	recall
predicate	Procedure	14:25	30:18,19	rational	27:20
d	6:25	23:2,12 26:11	37:17	25:7	28:9
45:3	proceedin	27:2	43:25		receive
prejudice	g	31:11,12	quick	<b>re</b> 38:7	26:17
12:7	46:9	35:13,15	40:10		
14:19	49:25	41:15	quiet	reach	received 8:17,19
prep	process	43:17	39:18	3:12	10:3
31:21	13:5	providing		read	15:23
prepare	26:11	28:8 43:4	<b>quite</b> 40:13	17:23	45:14
27:6	produced	proving	40:13	42:18 47:10	recent
	11:8	20:7		17.10	5:20 8:15
	-		ITACM	-	-



	<u> </u>	1	<u> </u>	1	
recommend	23:7	relief	represent	24	
31:5	regard	11:21	ing	Responsib	s
recommend	6:6 20:23	remember	3:4 43:10	ilities	
ation	22:6,12	30:2	reprimand	22:16	said
32:3	28:1,18	31:11	37:7		7:25
	29:5	43:12		responsib	12:6,14
reconcile	31:25		request	ility	13:6
d	48:19	remind 43:18	6:17	22:21	16:7,10
36:1	regarding		11:19 13:17	rest	25:15
reconvene	12:22	reminder	43:21	13:7	26:2,3,5
48:21		13:21	44:8	restart	33:17
record	regulatio	rendered		13:5	40:2 44:2,14
3:10 14:8	n	14:10	requested		44:2,14
18:1	17:24	repeated	33:8	result	same
33:24	related	10:13	requestin	21:6	17:22
34:20	7:10		g	28:22	18:7 25:5
42:7,23	37:15	repeatedl	19:8	results	28:15
record's	relates	У	33:10	3:11	33:10 35:11
24:12,13	3:23 4:12	15:16 39:8	requests	retain	38:6
	5:15 16:3	39:8	5:2	32:23	41:16
recorded 13:16	18:17	report	reschedul	revealing	
	19:7 23:8	3:18 4:8		47:8	sanctions
recording	24:2	6:11 7:11	<b>e</b> 47:20		21:25 24:17
s	relating	10:3,9	47:20	right	25:5
32:12	3:6,10,18	11:5,7 13:8		3:3 16:7,	
records	6:22 7:7	17:10	reset	14,15	saw
3:18 6:7	8:21		16:10	26:1,25 28:9	38:4
11:4,20	10:12,22	reporter	resolutio	31:12	say
recourse	12:2	3:8 13:16	n	32:16,17	8:7 12:2
11:21	20:16	14:18 35:3	40:12	36:13	13:21
	21:11,24 22:10	38:18	resolved	41:24	17:7 20:3
rectified	26:22	42:20	39:25	42:7,15	25:3
15:17	27:15	49:12,15,		43:9 45:2	30:19
18:16 34:21	28:20	17,19,24	respect	49:11	33:25 34:4
	35:6 36:2	reports	4:5 6:24 14:11	room	35:20
redacted	38:1	7:8,9	33:16	9:20	38:16
10:3,9	41:12	·	36:20	roster	39:4
11:8	48:11,13	represent		4:13 5:7	40:11,13,
reference	relation	ations	respond	36:25	22 43:11,
9:7	4:6 42:19	8:15 35:9	35:4		20 44:12
reference	relevance	represent	respondin	roundtabl	45:6,17
d	21:9	ed	g	<b>e</b>	46:2,4,22
8:25		25:17	39:20	20:19	saying
10:14	relevant	48:16	response	rules	12:16
refers	11:17		8:18 35:6	6:25 7:1	30:3,23
TETETD	22:8		43:2,5,6,	26:4,9,10	36:15
	•	•	•	•	•



41:25	seem	sent	23:2	some	sorry
ays	12:7	8:14 9:4,	settlemen	3:20	7:17
8:4,5,8	30:23	5 10:13	t	4:15,16	12:20
18:8 41:3	46:5	12:12		5:6 7:3,7	16:24
	seems	13:12,13	48:25	9:12,23	25:12
chedule	9:7 34:18	15:14,19	seven	13:17	30:4
31:18,19		16:8,18,	36:6	14:16,19	32:20
34:24	seen	20 25:21,	share	26:8 28:8	46:7
35:15	4:24	23 26:2	31:15	29:17,18	sort
41:13	17:23	28:11	33:11	31:14	6:17 9:2
cheduled	30:10	33:4 35:5		40:11	12:1
5:18	select	37:15	Shawn	41:2,12	14:19
38:17	47:17,22	38:2,4,13	3:5	48:9,21	20:7,19
40:7	48:9	41:22	short	somebody	26:8
42:20		42:11	32:2	43:10	32:25
	Semenza	44:4,7		44:19	41:2 48:
chedulin	3:3,4 6:4	45:9,15	show		
Ī	7:23 8:10	48:12	32:24,25	someone	sorts
3:20 5:6	17:14	separate	sic	29:4	8:18
31:6,21	19:5 20:7	28:17	16:22	32:9,11,	20:16,22
cope	24:10	36:22		22 33:1	31:23
14:1	25:11		significa	34:25	sought
	26:14,20,	serve	ntly	something	6:7
econd	25 30:1	12:25	17:5,6	9:24,25	
22:14	31:4 35:4	18:15	similar	14:7	sound
32:22	37:20,23	26:12	28:17	15:1,14	48:3
35:9	39:19	37:2,13,		26:8 27:7	sounds
secondly	40:10,21	18 38:8	similarly	28:11,13	45:20,23
32:10	44:2	43:25	9:16	30:21	49:24
	47:11,12,	served	since	32:14	speak
ecurity	20,24 48:3	13:3	5:24 17:9	40:19	13:4
37:11,12		18:21	22:19	41:6	32:6,9
38:8	49:6,11	24:6,18	25:23	45:13	
ee	send	25:13,14,	37:14	somewhere	specific
8:11	15:20,24	15 26:23	43:20,23	30:16	6:15
11:20,22	20:5	server	47:19	31:8	specific
12:14,17	26:18	26:11		31:0	_
21:8	33:5,7	20:11	sit	Somps	<b>11y</b> 22:9
22:11,12	35:21,23	serves	24:14	9:14	38:19
41:8	40:5	23:20	28:9 29:3	12:13	30:19
eek	47:13,16,	service	45:6	32:5,19	spoken
6:9 11:21	19,23	12:14,16	sitting	38:14	27:5
24:17	48:20	21:21	13:23	39:15	stalemat
25:4	49:18,20,	25:16,17,	31:11	42:14	30:8
	21	19 26:4,	akatina	47:6	30:8
eeking	sense	15,18,22	skating	49:10	stand
21:12,17,	27:8	13,10,22	45:2	soon	27:20
24	48:15	set	solves	16:6	28:4
	40:13	12:24	41:21	26:17	
		I	1	∠0:⊥/	



start	strict	48:5	10,11	34:8,9,23	26:12
30:18	38:23		24:4		27:20
		substance	32:12,23	tell	28:4,13,
statement	strike	27:11	37:6,7,9	21:18	19 30:13
S	44:5	substanti	38:6,7	28:1	31:1
13:7	strings	vely		47:17	32:3,12,
statute	8:20	27:5	suspect	telling	14,17
6:18	stuff		10:24	20:24	33:3 34:7
17:23	4:20	such	sustained	testify	35:8,12,
18:10	10:20	6:13	23:14	33:1	20 36:8,
26:8	16:18,19	46:24	system		10,12
aton	45:8	sudden	32:9 39:5	testifyin	40:2,3
<b>step</b> 48:4		39:10,17	32.3 33.3	g	44:1,8
48:4	subject	suggestio		41:16	48:6,18
Stephen	24:19		T	than	them
31:10	40:3	n		6:15 9:14	5:24
33:2	42:2,22	48:13	tactic	11:21	14:14,15,
39:25	43:8	sum	14:16	17:5,7	23,24
40:22	46:20	27:10	take	29:14	15:1 18:4
Steve	submitted	support	13:12	30:22,24	19:8,17,
4:1,10,15	4:14	18:11	21:2 25:7	39:13	23 20:5,
12:5	gubnoons		41:6		24 27:6
15:24,25	<b>subpoena</b> 3:17,19	supposed	44:18	thank	28:13
29:12	4:6 5:20,	15:24		17:17	29:4,24,
31:4	25 6:7,	44:23,24	taken	26:24	25 31:22
34:12	13,17,23	47:22	14:18	44:13	32:1,25
39:17	7:13,19	sure	talk	47:6,7	34:10
41:1 46:4	8:14 9:2,	32:14	3:16	48:23	36:25
48:23	18 10:23	38:11	17:21	49:5,11,	42:15
49:6	11:20	49:6,19	18:17,19	13,14	45:11,12,
Steve's	12:12,25		20:9 21:6	thankfull	19,20
16:3	13:4,5	surprised	22:13	У	46:10
18:14	15:13	42:13	31:16,18	34:20	theme
34:6	16:5,11,	surprises	41:8	Thanks	45:19
	12,16,17	40:24	48:6,7	49:6	
still	18:15,20	surreptit	talked		themselve
11:17	19:11,15	ious	27:13	that's	s
21:20	20:6	10 <b>us</b> 14:16	28:11	3:13,24	19:23,25
27:16	21:19,21,	45:13	41:4	4:9,10,11	30:9,22
36:9,16	22,23		43:23	5:4,5	then
43:4	23:3,4	surreptit	1	11:25	4:3,12
49:16	24:21	iously	talking	12:8,19,	5:5,19
stopped	25:18,21	16:18	10:19	21 13:16	9:5 12:3,
13:3	26:10,12	surveilla	39:5	17:21	15 13:3
story	28:22	1	tee	19:16	18:12
18:7	38:1	nce	11:12	21:6	20:4
TO:/	subsequen	22:15,16,		22:6,13	22:10
stream	t	20,21,23	telephone	25:9,12,	27:22
12:19	~	23:8,9,	18:23	20,24	28:15
	•	•	•	1	1



	•		Onawn r adma	v. Mon Grand	
	I	I	I	I	1
30:8	they've	9:9,24	3:21	31:9	12,13,18,
31:5,10,	28:11	10:9,13,	5:11,12,	40:12,14	19,21,22,
14,16,20	30:11	25 11:7,	14,17,18	46:12	23 12:1,
32:10	thing	10,11,12,	6:5 7:9	throughou	2,3,4,6,
35:22	10:12	18 12:5	8:18	t	7,13,17,
36:1,8	16:21	13:15	11:23	_	24 13:4,
37:8,10	18:7	14:10,18	12:11	46:8	6,8,11,
39:4,9	32:25	15:5,22	20:16,22	throw	14,17,23
40:3,6	35:8,9	16:15,18,	27:9,15	6:2	14:1,3,6,
41:7,9,12	40:10	19 18:21	28:4,24	tied	8,9,11,
42:3 44:7		19:8,17	29:10,17,	40:6	12,13,14,
45:17	things	20:5,8,	21,22	40:6	17,19,22,
there's	8:19 12:6	17,20	30:9,13	time	23,24
4:8,16	20:16,22	21:11,14,	31:13,20,	9:3,5	15:1,2,4,
5:6,23	28:10	15,20	23 33:8,	19:9	5,6,13,
9:20	31:23	22:10,25	14 35:25	31:19,25	20,21,24
16:11	34:9	23:9,14	36:1,8	32:2	16:2,3,8,
17:16	35:17	24:15,19	37:17	38:13,22,	15,21,22,
18:2,4	39:2	27:1,18,	38:10,12	23 49:4	23,24
20:11,19	40:23	22 29:8,	40:4,6,7	times	17:1,2,4,
20:11,19	41:19	12 31:5	41:15,19	47:18	7,10,11,
24:14	46:7	32:4,5,13	43:25	4/:18	12,14,18,
25:6	think	33:10	46:16	Tipton	21,22
27:17	3:13,19	34:7,8,	though	7:4	18:4,7,8,
36:6,16,	4:8 6:5,	13,17,22	17:19	13:20,23	9,15,17,
25 37:11	15,18,24	35:1,3,18		14:6 15:7	19,20,22,
41:5,7,	9:20	36:20,23	thought	to	23 19:2,
10,11	10:21	37:15,19	3:7,14	3:6,8,9,	6,7,8,11,
	11:10	38:5,16,	4:18	10,12,14,	12,14,15,
thereafte	20:7,9,17	17,18,20,	12:20	16,17,18,	17,18,23
r	21:2,8	25 39:5,	14:15	19,20,23	20:3,4,9,
7:13 8:25	22:6,11	14,17	34:11,22	4:2,5,6,	14,15,17,
therefore	24:16,24,	40:20,24	38:24	8,12,20,	18,23,25
23:15	25 32:8,	41:23,24	threatene	25 5:3,	21:1,2,3,
24:1 26:9	10 33:10	42:6,7,	d	11,15,16,	4,5,6,9,
	35:10	10,11,19,	25:4	17,21	11,12,15,
these	40:15,18	21 43:1,		6:1,3,6,	17,19,20,
11:16,20,	41:4,5,	3,11,12,	three	9,12,13,	24 22:1,
22 29:15	12,20	15,20,21	24:9 25:9	14,20,21,	6,7,10,13
30:17	44:3	44:7,10,	36:16	22,25	23:5,7,8,
32:2 33:4	48:4,6	11,15	40:14	7:3,7,14,	13 24:2,
34:9 37:2		45:1,7,	throes	18 8:3,	7,9,14,
39:1	third	18,19	15:19	12,17,19,	15,17,20,
41:12	5:19 6:3	46:3,8,		21,22	22 25:4,
42:25	9:6 39:11	13,20,21	through	9:7,21	7,11,12,
they'd	this	47:3,7,	12:9,11,	10:8,10,	13,16,18
49:8	4:19,20	10,11,15	24 24:18	12,21,22,	26:1,5,7,
	6:20 7:3,	48:2,23	28:10	25 11:1,	10,11,12,
they'll	21 8:3	those	29:2	2,9,11,	18,21,22
28:15			30:23	, - , ,	27:4,6,7,

					02.55
9,15,17,	24 46:3,	44:7,10	trying	understan	23:16
23,24	4,5,12,22	45:2	4:19	d	27:12
28:2,14,	47:2,3,4,	topics	14:19	3:15 9:12	42:5
16,20,22,	10,11,14,	12:4	29:20	22:4	44:12,18
25 29:1,	19,22,23	27:12,16	40:15	25:18	us
3,4,5,6,	48:5,6,7,	28:12,15,	47:3	32:1	4:10
7,20	8,9,11,	17 29:19,	turned	understan	5:16,25
30:3,6,7,	13,17,19	23 30:6,	39:6		6:22 7:18
8,14,19,	49:8,18,	9,10		ding	11:1,2,6
20,23,24,	19,20,21,	31:3,9,	twice	5:20	16:15
25 31:8,	22,23	11,12,14,	37:14	21:10	17:12
13,14,22,	today	17 33:3,	two	25:23	18:7,8
23,25	3:13 4:2,	5,7,9,13,	3:18 4:12	28:6 31:1	19:12
32:2,3,9,	10 18:1,	21,22	19:19,21	understoo	26:4
14,24	16 33:24	36:3	33:8,13	d	31:14
33:1,6,7,	34:10,17	40:12	36:8,21	4:14	33:5,17,
16,24	36:11	41:12,18	37:4,17	15:20	22 34:2
34:4,9,	37:16,19,	42:8,9,	38:4 39:9	34:8	35:14
13,16,23,	21 47:3,	14,16	40:14		39:1,4,15
25 35:4,	21 47:3,	l .	42:25	undertake	41:3
6,10,13,		touch	44:7,20	3:23 29:7	42:24
14,16,17,	today's	3:20 4:2	45:25	undertake	45:7
19,23,24	3:5	tracking	46:16		47:8,9,
36:2,7,9,	34:15,18	32:9		<b>n</b>	16,17,19
19,20	43:7		type	7:21 9:8	10,11,19
37:7,8,	together	trained	7:10	20:14	use
15,16,24,	3:5	13:22	types	undertook	17:8
25 38:1,		transcrib	23:23	8:1	
12,13,16,	told	e		unless	v
18,22	12:19	3:8		20:2,24	l ———
39:1,4,6,	29:20		Ū	30:16	
15,20	44:2	transcrib		43:5	vacuum
40:1,3,5,	too	ed	ultimatel		9:25
11,13,15,	33:20	3:14	У	Until	various
16,18,19,		transcrip	3:11	18:11	6:11
22 41:4,	took	_	11:23	up	
5,10,11,	8:22 9:15	t	21:6	11:12	verbiage
12,13,15,	10:21	14:10,18	28:14	12:24	40:16
16,18,23,	13:19	15:4,7	29:7	29:10	verify
25 42:1,	topic	42:22	31:20	30:22	15:23
6,8,11,	6:2 17:13	47:10	41:8	38:3	WATE.
16,18,19,	20:17,18	tremendou		39:13	very 11:11
22 43:1,	28:3	s	uncommon	40:6 44:8	14:5
2,7,19,	30:21	44:19	34:2	48:19	
20,25	36:23		under		19:21
44:9,11,	37:1	troubled	38:22	upon	21:2
13,17,18,	38:18,20	41:25		5:8 6:18	32:19
23,24	39:11	try	underhand	13:1,4	34:24
45:10,11,	43:15,20	12:24	edly	16:22,23,	41:25
12,17,22,			46:6	25 18:21	42:12,24

			Silawii Fauilia	. WIGNI Grand	TIOICI, LLC, CI
43:7,15	47:11,19	27:1,2,4,	19:6	17:14	   whatsoeve
44:7,10	49:19	7,8,14,	20:15	19:5,19	
45:3 47:8		15,20	24:20	31:3,6	r
45:5 47:6	wanted	28:4,13,	28:16	32:19,21	8:8 13:13
<i>r</i> ia	22:13			*	39:7
5:7 8:14	40:17	23 29:7,	29:10	33:25	44:17
		13,17,19,	30:17	34:24	46:21
rideo	wanting	22,23,25	32:11	35:4	when
32:12	18:17	30:3,13,	34:16	37:2,20	6:3 10:2
riewpoint	36:9	18 31:1,	36:13,20	38:20	12:19
10:10	wants	5,6,13,	38:22	40:21	13:1
	3:23 20:3	16,18,20	39:14	44:1	17:18
riews	46:3	32:1,4,8,	40:9,17	45:18,20	25:2,13,
32:25		14,22	41:18	47:14	19 26:23
violation	waste	33:11,21,	42:1,13	48:4	
6:24 7:1	38:12	23,25	43:3,20	49:18	32:24
	way	34:11	44:23	went	33:25
rirtue	7:8 20:19	35:1,5,	49:4	12:17	34:17
11:12	21:2,7,14	15,24,25	we've	26:12	35:2
	27:22	37:7,9,10			43:11
TAT		39:19,21,	4:14 5:7	30:8	47:17
W	29:9,13	25 40:2,	19:20	what	48:25
	30:24	6,11,12,	27:12	3:9 4:25	Whenever
ait	35:17	15 41:1,	28:10	8:23	47:12
45:25	we	3,4,5,8,	33:19	10:16,21,	49:23
47:9	3:12 4:3	13 42:15	35:18	24 11:6,	49:23
	5:14,17	43:1,11,	36:16,24,	18 12:2,	where
vant	6:2,3,12	12,17,19	25 45:23	21 13:13	7:5 13:2
4:2 5:11	7:4,11,	44:4,6,	Wechsler	15:5	22:3
10:12	14,15,25	22,24	49:1	21:18	25:19
11:23	9:10,16,	1	49:1	22:9	27:14,20
12:1,2,3	19,21	45:24	week		28:4,23
17:14		46:12	31:7	26:9,20	29:10,19
18:19,20	10:1	48:14,25	34:10	28:14	30:13
20:4	11:12,20	we'll	35:1,20	29:5,9,20	31:1 41:
21:1,6	12:3,9,	3:10 8:3	39:11,22	30:23,25	
22:7	11,14,15	12:8 16:1	42:2	31:4,22	whereby
24:17	13:2,3,4	24:7 25:5	46:21	32:23	9:14
30:6,7	15:4,6,7,	39:10	47:1,5,	33:17	whether
32:14,22	23 16:6	42:2	10,18,19	37:22	10:24
33:24	17:2,3,5,	47:1,4,	49:3	40:2,16,	
34:4	6,20,21,	13,20		17 41:3,	11:4,17
35:16,19	22 19:18	1	weeks	4,5,13	20:14,15
36:19	20:4	48:16,20,	36:17	47:10	27:9,15,
37:7	21:8,14,	21,22	43:13,14,	whatte	16,24
38:10,12,	23,24	49:1,12	15	what's	28:11,25
16 40:1,	22:1,25	we're		7:8 28:19	31:23
	23:1,2,6,	3:16,20	well	45:5	35:22
5,13 42:8	16 25:1,	6:14	4:19 5:11	whatever	38:16
44:11	6,21	16:15,21	8:10 9:18	28:3	41:15
45 15 00	1 -,	1	13:20		48:17
45:17,22,	26:1.2.5.	17.9			
45:17,22, 24 46:4, 5,22	26:1,2,5, 9,19	17:9 18:16	16:2		

which	19:16	37:1	45:22,24	42:16	
4:18 6:9,	21:6	38:18,21	46:13,14,	48:20	
23 7:14	22:13	39:15	17,18		
8:2 9:1	31:6	41:15	48:12,15,	years	
11:6	33:11	42:17,20	18	44:20	
12:18	34:16,25	43:17		yep	
14:20	47:16	45:6,12,	won't	20:3	
17:4		18 46:1,	27:25	20.5	
	window	1	39:21	yes	
19:19	41:14	6,8,10,19	40:4	29:22	
20:25		49:1	landan	43:11	
22:2,23	with	withdraw	wonder		
24:3	4:5,9,16,	6:16	14:17	yesterday	
27:25	20 6:1,6,	24:20	wonderful	25:22,24	
30:6,25	23 7:19	1	14:5	yet	
31:20	8:7,16	withdrawa		4:25 9:21	
34:20	9:13,22	1	word	27:6	
35:12	10:2,22	11:19	7:25	44:11	
38:24	11:1,23		work	1	
39:6,11	12:8,10,	within	28:13	yourself	
41:14	23 13:6,	23:23,24		46:8	
43:3,9	12,19	without	31:6,21		
44:13	14:11,13,	11:6 26:4	48:21		
45:13	25 15:11,	30:13	working		
	12 16:17	1	28:1		
vhile	17:20,24,	witness	32:21		
8:17	25 18:3,	3:24			
23:21	5,6,7,10	20:13,21	works		
29:3 33:9		21:12,13,	13:22		
42:3	19:21,22	15 27:3	32:10		
-h -	20:8,12,	28:2	world		
nho	23 22:6,	31:24	26:1		
23:10,12	18 23:2,	39:24	26:1		
32:9,11,	7,20,22	47:21	wrong		
23 33:1,	24:15		9:20		
14 36:7	25:4	witnesses	23:12		
37:5,6	26:7,14,	27:5,21,	27:2 32:7		
38:6,11	19 27:2,	23 28:8	33:23		
44:13	4,5,19,	29:18,21			
who's	24,25	30:14,15,	wrongdoin		
	28:11,13,	17,24	g		
5:24	21 29:10	31:21	18:12		
18:25	30:3,12,	32:7			
whole	13,23	34:14			
3:7,12	31:2,8,	35:7,11,	Y		
34:7 35:2	15,22	12,15,22			
	32:1,5	36:6,22,	yeah		
vhy	33:13,16,	24 38:21	12:16		
3:13 5:22	20,21		30:19		
10:19		41:14,17	32:17		
17:17	34:1,2,3,	42:25	39:19		
	4,5 35:14	43:4,8,	1 22.19	1	
18:22	36:18,19	16,22	40:8		